







# Fully Compliant and Incompliant Extension Examples Report

## Privacy Policy Legend

	Others
	Data Collection (DC)
	Data Retention (DR)
	Data Usage (DU)
	Contact Information (CI)
	Data Subjects Rights (DSR)

## Fully Compliant Example

### 1. Basic Information

Extension ID: lkffbjbdklhachngaoeelmcgijmlicph

Extension name: Sophos Chrome Security

Chrome webstore link:

<https://chrome.google.com/webstore/detail/sophos-chrome-security/lkffbjbdklhachngaoeelmcgijmlicph>

Privacy policy link: <https://www.sophos.com/en-us/legal/sophos-group-privacy-notice>

### 2. Privacy Policy

*Privacy Policy*

*General*

*This is the privacy notice of Sophos Limited and its subsidiaries.*

*This document was last updated on 10 February 2022.*

*We are committed to safeguarding the privacy of your personal data. Please read the following privacy notice to understand how we collect and use your personal data, for example when you contact us, visit or use one of our websites, mobile applications, portals, or other parts of our network (each a “Site”), apply for a job, or use our products and services, regardless of how you access them. This privacy notice also explains the rights available to you in respect of your personal data.*

*What personal data do we collect, how do we collect it, and why?*

*Data that you provide voluntarily to us*

*When you use our Site, products or services, or you otherwise communicate with us, we may ask you to provide certain personal data voluntarily, including but not limited to your name, company position, postal address, telephone number, mobile number, fax number, email address, credit card or other payment details, age or date of birth, account usernames,*

passwords, or gender. For example, we may ask you to provide some or all of this personal data when you register an account with us, subscribe to our marketing communications, purchase products or services, and/or submit enquiries to us. → Data Collection (DC), Personal Information (PI)

We use this information to create and administer your account, send you marketing communications, provide you with the products and services you request, and to respond to your enquiries. → Data Usage (DS)

In general, the personal data that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal data.

#### *Data collected automatically*

When you use our Site, products, or services, we may collect certain data automatically from your computers or devices (including mobile devices). The data we collect automatically may include your IP address (explained further below), device type, operating system details, unique device identification numbers (including mobile advertising identifiers), browser-type, browser language, operating system, geographic location (as explained further under the heading “Location information”) and other technical information. → Data Collection (DC), Device Information (DI)

We may also collect data about how your device has interacted with our Site, products or services, including the pages or features accessed and links clicked, the amount of time spent on particular pages, mouse hovers, the date and time of the interaction, error logs, referring and exit pages and URLs, and similar information. → Data Collection (DC), Activity Information (AI)

Collecting this data enables us to better understand the visitors who use our Site, products, and services, including where they come from and what features are of interest to them. We use this information for our internal analytics purposes, and to improve the quality, relevance, and security of our Site, products and services. → Data Usage (DU)

For example, every time you connect to the Site, we store a log of your visit that shows the unique number your machine uses when it is connected to the Internet - its IP address. This log tells us what your machine has looked at, whether the page request was successful or not, and which browser your machine used to view the pages. This data is used for statistical purposes as well as to help customize the user experience as you browse the Site and subsequently interact with Sophos. This helps us to understand which areas of the Site are of particular interest, which pages are not being requested, and how many people are visiting the Site in total. It also helps us to determine which products and services may be of specific interest to you. We may also use this information to block IP addresses where there is a breach of the terms and conditions for use of the Site. → Data Usage (DU)

Some of the data may be collected automatically using tracking technologies, as explained further under the heading “Cookies and similar tracking technology”. → Data Usage (DU)

#### *Data that we obtain from third party sources*

From time to time, we may receive personal data about you from third party sources (including without limitation recruitment agencies, credit check agencies, agencies providing compliance checks, lead generation providers, resellers, and other partners who sell our products and services to you), but only where such third parties have confirmed that they have your consent or are otherwise legally permitted or required to disclose your personal data to us.

The types of information we collect from third parties include contact details, CVs, credit history, and order information, and we use the information we receive from these third parties to assess your suitability for a job position, carry out compliance checks required under applicable law (such as anti-bribery and corruption checks), make credit decisions, maintain and improve the accuracy of the records we hold about you, and market our products and services to you.

We also receive information from other members of the industry that forms part of or otherwise helps us to develop, test, and enhance our own product offering (for example spam lists, malicious URL lists, and sample viruses), some of which could contain personal data (where permitted by applicable law).

We may combine information that we collect from you with information about you that we obtain from such third parties.

#### *Data collected through our products and services*

We use data that we collect from products and services for the purposes for which you provided it, usage and audience counts, monitoring the performance and effectiveness of the products/services, monitoring compliance with our terms and conditions, enabling compatibility with third party operating systems/products/services, planning future roadmap strategy, planning product/service/feature lifecycles and retirements, conducting spam, threat and other scientific research, developing new products and services, enhancing existing products and services, troubleshooting product issues, generating statistics, reporting, and trend analysis. This may include incidental personal data (for example usernames, machine IDs, domain names, IP addresses, file names, and file paths).

Our products and services may collect further additional personal data about you beyond the data described in this privacy policy, or use your personal data in ways that are different to or in addition to those described in this privacy policy. We provide a Product Privacy Information page that explains how our products and services collect and use personal data. Please review the relevant section of the Product Privacy Information page for the product or service you are using to ensure that you are fully informed.

#### *Cookies and similar tracking technology*

A cookie is a piece of text that gets entered into the memory of your browser by a website, allowing the website to store information on your machine and later retrieve it. → Data Collection (DC), Activity Information (AI)

Our Site, products, and services may use cookies, unique device identifiers (like Apple ID For Advertisers on iOS devices, and Android Advertising ID on Android devices), and other tracking technologies (collectively, "Cookies") to distinguish you from other users and better

serve you when you return to the Site, product, or service, and to monitor and analyse the usage of the Site, product, or service. Cookies also enable us and our third party partners to track and target the interests of our users to enhance the onsite or in-product experience through content, features, and advertisements. → Data Usage (DU)

We, along with our service providers, may also use other Internet technologies, such as Flash technologies, Web beacons or pixel tags, and other similar technologies, to deliver or communicate with cookies and track your use of the Site, product, or service, as well as serve you ads and personalize/customize your experience when you are using our Site, product, or service and/or when you are on other websites where those cookies can be accessed. We may also include Web beacons in email messages, newsletters, and other electronic communications to determine whether the message has been opened and for other analytics, personalization, and advertising. As we adopt additional technologies, we may also gather additional information through other methods. This practice is explained further under the heading “Marketing and promotions”.

As explained above, we occasionally share information you have provided to us with service providers, who will de-identify the information and associate it with cookies that enable us to reach you. We may also help these service providers place their own cookies, by deploying a cookie that is associated with a 'hashed' value associated with interest-based or demographic data, to permit advertising to be directed to you on other websites, applications or services.

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that your ability to sign in, customize, or use some of the interactive features of our Site, product, or service may be impeded, and the advertisements you see may not be as relevant to you.

For more information about the cookies that we use, please refer to our Cookie Information page.

#### *Location information*

We may collect different types of information about your location, including general information (for example IP address or ZIP code) and more specific information (for example GPS-based functionality on mobile devices when used to access a Site, product, or service). This information may be used to customize the services provided to you, such as location-based information, advertising, and features. In order to do this, your location information may be shared with our agents, vendors, or advertisers. If you access the Services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details. → Data Collection (DC), Device Information (DI)

*Other specific ways we collect and use your personal data*

#### *Job applications*

*If you are making a job application or inquiry, you may provide us with a copy of your CV or other relevant information. We may use this information for the purpose of assessing your application or inquiry. We may also keep this information on file to contact you about future opportunities, unless you ask us not to do this.*

#### *Partner portal*

*Our resellers, distributors, and other partners may visit our partner portal Site. We may use the information provided on that Site for partner relationship management, billing, forecasting, trend analysis, renewal management, marketing, and in order to sell and provide the products and services.*

#### *Account management*

*If you obtain products or services from us, we may use your contact details and (where applicable) payment information for the purposes of (i) providing training, customer support, and account management, (ii) order processing and billing, (iii) verifying your usage of the products and services in accordance with the terms and conditions of your agreement with us, (iv) carrying out checks for export control, anti-bribery, anti-corruption, the prevention of modern slavery, and other compliance purposes in accordance with requirements under applicable law; (v) contacting you (including by email communication) regarding license expiry, renewal, and other related notices, and (vi) maintaining our company accounts and records.*

#### *Market research and surveys*

*If you participate in surveys, we may use your personal data for our internal business analysis and training purposes in order to improve our understanding of our users' demographics, interests and behaviour, to measure and increase customer satisfaction, and to improve our products and services.*

#### *Competitions, contests, promotions*

*If you participate in a competition, contest, or promotion conducted by us or on our behalf, we may use your personal data in order to administer such competition, contest, or promotion. We may also use your personal data as explained further under the heading "Marketing and promotions".*

#### *Chat rooms*

*Please be careful and responsible whenever you are online. Should you choose to voluntarily disclose information to open areas of our Site, such as via the Sophos Community, online help, or other chat rooms, that information can be viewed publicly and may be collected and used by third parties without our knowledge or consent, and may result in unsolicited messages from other individuals or third parties.*

#### *Marketing and promotions*

*We (or our resellers or other selected third parties acting on our behalf) may contact you from time to time in order to provide you with information about products and services that may be of interest to you. Such communications may contain tracking technology that tells us whether*

you opened the communication and whether you followed the hyperlinks within the communication, in order to help us analyse the effectiveness of, monitor, and improve our marketing campaigns. All marketing communications that we send to you will respect any marketing preferences you have expressed to us and any consent obligations required under applicable privacy and anti-spam rules. You have the right to ask us not to process your personal data for certain or all marketing purposes, but if you do so, we may need to share your contact information with third parties for the limited purpose of ensuring that you do not receive marketing communications from them on our behalf.

#### **Network monitoring**

We may collect logs and other data about access to and traffic passing through our network and equipment for the purposes of availability and performance monitoring, maintenance, security monitoring and investigations, conducting spam, threat and other scientific research, new product and service development, the enhancement of existing products and services, generating statistics, reporting, and trend analysis.

#### **Sample submissions**

We collect information about suspected spam, suspected malicious files, and files that may be unwanted or undesirable for our customers (for example file names, URLs, file paths, hashes, and file samples) that are (i) received by our own network and equipment, and (ii) voluntarily submitted via our products and services or our Site submission pages. We use this information for spam, threat and other scientific research, new product and service development, the enhancement of existing products and services, generating statistics, reporting, and trend analysis.

#### **Legal basis for processing personal data**

Our legal basis for collecting and using personal data will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data from you only where we need the personal data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another person.

If we collect and use your personal data in reliance on our legitimate interests (or those of any third party) other than as described in this privacy policy, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided under the “Contact” heading.

#### **With whom might we share your personal data**

We may transfer or disclose your personal data to the following categories of recipients:

to our group companies, third party services providers, suppliers, agents, and other organisations who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Site, products, or services), or who otherwise process personal data on our behalf for purposes that are described in this privacy policy or notified to you when we collect your personal data (such as advertising, sweepstakes, analytics, research, customer support, fraud prevention, and legal services);;

to our authorised resellers, distributors, and other channel partners in order to process your order or sales enquiry, manage your subscription, provide technical or customer support, advise of upcoming product or service subscription expiry and renewal dates, or as otherwise notified to you when we collect your personal data;

a subset of our threat intelligence data to selected reputable members of the IT security industry for the purpose of anti-spam and security threat research;

to any government department, agency, court or other official bodies where we believe disclosure is necessary (i) as a matter of applicable law or regulation (such as in response to a subpoena, warrant, court order, or other legal process), (ii) to exercise, establish, participate in, or defend our legal rights, or limit the damages we sustain in litigation or other legal dispute, or (iii) to protect your vital interests, privacy, or safety, or those of our customers or any other person;

to a potential or actual buyer or transferee (and its agents and advisers) in connection with any proposed or actual transfer of control, purchase, merger, reorganisation, consolidation, or acquisition of any part of our business, provided that we inform the buyer or transferee it must use your personal data only for the purposes disclosed in this privacy policy;

to any other person with your consent to the disclosure.

Except as set out above, we will not disclose your personal data save where we need to do so in order to enforce this privacy policy, our End User License Agreement, our rights generally, or where required or permitted by applicable local or foreign law.

Whenever we share personal data, we take all reasonable steps to ensure that it is treated securely and in accordance with this privacy policy. This may include without limitation aggregating or de-identifying information so that it is not intended to be used by the third party to identify you.

### *Data Transfers*

As a global company, we and our service providers operate, and our Site, products, and services are accessed from, all over the world. When you give us personal data, that data may be used, processed, or stored anywhere in the world, including in countries that have data protection laws that are different to the country in which you reside.

However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this privacy policy. For example, these include implementing the European Commission's Standard Contractual Clauses (SCCs) for transfers of personal data between our group companies, which require all group companies to protect personal data they process from the European Economic Area in accordance with European Union data

protection law. We have implemented similar appropriate safeguards with our third party service providers, and further details can be provided upon request by contacting us using the contact details provided under the “Contact” heading.

#### Data retention

We retain personal data we collect from you for as long as necessary for the purposes for which the personal data was collected or where we have an ongoing legitimate business need to do so (for example, to provide you with a product or service you have requested, to ensure that transactions can be processed, settled, refunded, charged back, or to identify fraud), or to comply with applicable legal, tax, or regulatory requirements. Even if you close your account, we will retain certain information in order to meet our obligations.

When we have no ongoing legitimate business need to process your personal data, we will either securely destroy, erase, delete or anonymise it, or if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible. → Data

#### Retention (DR)

#### Use by children

The Site, the products, and the services are not intended for persons under the age of 16. By using the Site, product, or service, you hereby represent that you are at least 16 years old.

#### Automated decision-making

In some instances, our use of your personal data may result in automated decisions being taken that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, our products and services use automated decisions to determine whether a domain, URL, or IP address is sending spam or malicious content in order to protect our customers from unwanted or undesirable content. We have implemented measures to safeguard the rights and interests of individuals whose personal data is subject to automated decision-making, including controlled product releases and regular quality assessments.

When we make an automated decision about you (for example if we block a domain, URL, or IP address used by you), you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contact us using the contact details provided under the “Contact” heading.

#### Your data protection rights

You have the following data protection rights:

You can access, delete or request portability of your personal data by completing this form.

You may also ask us to correct or update your personal data, object to processing of your personal data, or ask us to restrict processing of your personal data using the contact details provided under the “Contact” heading



You have the right to opt-out of marketing communications we send you at any time. You can usually exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. Alternatively, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “Contact” heading.

If we have collected and process your personal data with your consent, then you can withdraw your consent at any time by contacting us using the contact details provided under the “Contact” heading. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. → Data Subject Rights (DSR)

#### Links

This privacy policy applies to personal data collected by us. If we provide a link to a third party site (whether through our Site, a product or service, or in an e-mail we send you), please be aware that we are not responsible for the content or privacy practices of such third party site. We encourage our users to be aware when they leave our Site, and to read the privacy policy of other sites that collect personal data. We are not liable for any disputes, loss, or damage that may arise from or in connection with your use of such third party sites.

#### Security

While we strive to protect your personal data, no data transmission or storage can be guaranteed as 100% secure. We endeavour to protect all personal data using reasonable and appropriate physical, administrative, technical, and organisational measures, and in accordance with our internal security procedures and applicable law. These safeguards vary based on the sensitivity of the information that we collect, process, and store, and the current state of technology.

If you have been given or have created log-in details to provide you with access to certain parts of our Site (for example our partner portal), you are responsible for keeping those details confidential in order to prevent unauthorised access to your accounts.

#### California privacy rights

##### California Online Privacy Protection Act Notice Concerning Do Not Track Signals

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. We do not recognize or respond to browser-initiated DNT signals, as the Internet industry is currently still working toward defining exactly what DNT means, what it means to

comply with DNT, and a common approach to responding to DNT. To learn more about Do Not Track, you can do so [here](#).

### *Your California privacy rights*

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their 'personal information' (if any, and as defined under applicable California law) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. [If you are a California resident and would like to request this information, please submit your request using the contact details provided under the “Contact” heading.](#) → Data Subject Right (DSR)

### *Data Processing Agreement*

If the provision of products and/or services constitutes processing by Sophos of personal data as processor under applicable data protection laws, Sophos' obligations are documented in the Sophos Data Processing Addendum (“DPA Addendum”). The DPA Addendum is incorporated by reference into our agreements with our Customers, Managed Service Providers and OEM partners. If you require a signable Data Processing Agreement (“DPA”), you can countersign our pre-signed version [here](#).

Please note, Sophos will not sign a Data Processing Agreement with its distributors and resellers, unless they are using Sophos products. Order data from end customers that is provided by distributors/ resellers to Sophos is received by Sophos in its capacity as a data controller.

### *Contact*

[This is the website of Sophos Limited, a company registered in England and Wales under company number 2096520, whose registered office is at The Pentagon, Abingdon Science Park, Abingdon, Oxon, OX14 3YP, United Kingdom, and whose VAT registration number is 991 2418 08. Sophos Limited is the controller of personal data collected under this privacy policy \(unless we indicate otherwise\).](#)

[We have appointed individuals who are responsible for the protection and security of your personal data. If you have any questions, comments, concerns, grievances, or complaints about this privacy policy or the manner in which we treat your personal data, or if you want to request any information about your personal data or believe that we are holding incorrect personal data on you, please contact our Data Protection and Privacy team at \[dataprotection@sophos.com\]\(mailto:dataprotection@sophos.com\).](#)

[If you wish to unsubscribe from marketing communications, please email \[unsubscribe@sophos.com\]\(mailto:unsubscribe@sophos.com\).](#) → Contact Information (CI)

### *Notification of changes*

We reserve the right to amend or vary this policy from time to time to reflect evolving legal, regulatory, or business practices. When we update our privacy policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make (which, for

minor changes, may include posting the revised privacy policy to our Site with immediate effect). Please check this page periodically for changes. We will obtain your consent to any material privacy policy changes if and where this is required by applicable data protection laws.

You can see when this privacy policy was last updated by checking the “last updated” date displayed at the top of this privacy policy under the “General” heading.

Compliance explanation:

$\Pi_{\text{Sophos}} = \{\text{DC}, \text{DU}, \text{DR}, \text{CI}, \text{DSR}\}$ . LastPass includes all 5 labels listed in Table 1; thus, LastPass satisfy the minimum privacy requirements.

Moreover, in privacy policy, the controller states that the extension collects all three types of personal data including {PI, AI, DI}.

### 3. Privacy Practice Summary

The screenshot of privacy practice summary from Chrome Web Store:

The screenshot shows the Chrome Web Store page for the 'Sophos Chrome Security' extension. The page header includes the extension's name, a 4-star rating from 14 reviews, a 'Productivity' category tag, and a '10,000+ users' badge. A blue 'Add to Chrome' button is in the top right. Below the header, a navigation bar has tabs for 'Overview', 'Privacy practices' (which is selected), 'Reviews', 'Support', and 'Related'. The 'Privacy practices' section is titled 'Privacy practices' and contains the following text: 'Sophos Chrome Security has disclosed the following information regarding the collection and usage of your data. More detailed information can be found in the publisher's [privacy policy](#).' Below this, it states 'Sophos Chrome Security collects the following:' and lists three categories of data collection in a table: 'Personally identifiable information', 'Location', and 'Web history'. To the right of this table, a section titled 'This publisher declares that your data is:' lists three bullet points: 'Not being sold to third parties, outside of the [approved use cases](#)', 'Not being used or transferred for purposes that are unrelated to the item's core functionality', and 'Not being used or transferred to determine creditworthiness or for lending purposes'.

Category
Personally identifiable information
Location
Web history

This publisher declares that your data is:

- Not being sold to third parties, outside of the [approved use cases](#)
- Not being used or transferred for purposes that are unrelated to the item's core functionality
- Not being used or transferred to determine creditworthiness or for lending purposes

In PPS, the extension declares that they collect 3 categories of personal data. These 3 categories of personal data can be divided into 3 different data types which is listed in Table 2.

Personally identifiable information	→ PI (Personal Information)
Location	→ DI (Device Information)



Web history



→ AI (Activity Information)

Therefore,  $\Delta = \{PI, AI, DI\}$ . The types of collected personal data stated in privacy policy also comply with the types of collected personal data stated in PPS.

#### 4. Privacy Practice

Source Code:

Located at `./src/utils/system_info_utils.js` :

```
static async getDeviceAnnotatedLocation() {
  let a = new Promise(a => {
    try {
      chrome.enterprise.deviceAttributes.getDeviceAnnotatedLocation(b => {
        a(b)
      })
    } catch (b) {
      console.log(b), a(void 0)
    }
  });
  return a
}
```

→ DI (Device Information)

```
static async printSystemInfo() {
  SystemInfoUtils.printExtensionVersion(), SystemInfoUtils.printCpuInfo(), SystemInfoUtils.printMemoryInfo(), SystemInfoUtils
    .printStorageInfo(), SystemInfoUtils.printDisplayInfo(), SystemInfoUtils.printLocalIps(), SystemInfoUtils.printLocationInfo(),
    SystemInfoUtils.printInstalledExtensions();
  var a = SystemInfoUtils.getChromeVersion(),
    b = SystemInfoUtils.getUserAgent(),
    c = SystemInfoUtils.getOS();
  console.log("OS: ", c), console.log("UserAgent: ", b), console.log("chrome version: ", a), SystemInfoUtils.isChromeOs() && chrome
    .system.network.getNetworkInterfaces(function(a) {
      for (var b = 0; b < a.length; b++) {
        var c = a[b],
          d = c.name,
          e = c.address;
        console.log("info: ", c), console.log("networkName: ", d), console.log("networkAddress: ", e)
      }
    })
}
```

→ DI (Device Information)

Located at `./src/background.js` :

```
function isScanRequiredResource(a, b) {
  return a !== chrome.webRequest.ResourceType.STYLESHEET && a !== chrome.webRequest.ResourceType
    .FONT && a !== chrome.webRequest.ResourceType.PING && a !== chrome.webRequest.ResourceType
    .CSP_REPORT && !(b && a !== chrome.webRequest.ResourceType.MAIN_FRAME && a !== chrome
    .webRequest.ResourceType.SUB_FRAME)
}
```

→ AI (Activity Information)

Located at `./src/options/enrolment.html` :

```
<div class="enroll_title_text">__MSG_enroll_title__</div>
<div class="enroll_title_input_box">
  <input type="text" id="enrollment_base64" class="enroll_token_input" />
  <div class="menu_button enroll" id="enroll_btn">
    __MSG_enroll__
  </div>
</div>
```

→ PI (Personal Information)

Located at `./src/options/supports.html`:

```

<tr>
  <td class="label">__MSG_support_first_name__</td>
  <td id="first_name"></td>
</tr>
<tr>
  <td class="label">__MSG_support_last_name__</td>
  <td id="last_name"></td>
</tr>
<tr>
  <td class="label">__MSG_support_email__</td>
  <td id="email"></td>
</tr>
<tr>
  <td class="label">__MSG_support_phone_number__</td>
  <td id="phone_number"></td>
</tr>
<tr>
  <td class="label">__MSG_support_mobile_number__</td>
  <td id="mobile_number"></td>
</tr>
<tr>
  <td class="label">__MSG_support_additional_information__</td>
  <td id="additional_information"></td>
</tr>

```

→ PI (Personal Information)

The Chrome APIs and user inputs that are related to collection of personal data show that 3 types of personal data including {PI, AI, DI} are collected. The data collection practices of source codes in JavaScript comply with privacy policy and PPS.

## 5. Conclusion

For privacy policy,  $\Pi_{\text{Sophos}} = \{\text{DC}, \text{DU}, \text{DR}, \text{CI}, \text{DSR}\}$  shows that *Sophos* satisfies the minimum privacy requirements. Meanwhile, the policy declares the collection of data {PI, AI, DI}.

For privacy summary, the extension declares the collection of all three types of personal data including {PI, AI, DI}.

For privacy practice, the extension collects all three types of personal data including {PI, AI, DI} that have been declares in privacy policy and privacy practice summary.

## Fully Incompliant Example

### 1. Basic Information

Extension ID: nigogmdhflhaccbenffaaicgdjehldfn

Extension name: LacRoi

Chrome webstore link:

<https://chrome.google.com/webstore/detail/lacroi/nigogmdhflhaccbenffaaicgdjehldfn>

Privacy policy link: <https://app.lacroi.io/privacy>

### 2. Privacy Policy

#### *Privacy Policy*

*LacRoi owns and operate this Website. This document governs your relationship with app.lacroi.io Access to and use of this Website and the products (Google Chrome Extension) and services available through this Website (collectively, the "Services") are subject to the*

following terms, conditions and notices (the "Terms of Service"). By using the Services, you are agreeing to all of the Terms of Service, as may be updated by us from time to time. You should check this page regularly to take notice of any changes we may have made to the Terms of Service.

Access to this Website is permitted on a temporary basis, and we reserve the right to withdraw or amend the Services without notice. We will not be liable if for any reason this Website is unavailable at any time or for any period. From time to time, we may restrict access to some parts or all of this Website. This Website may contain links to other websites (the "Linked Sites"), which are not operated by [www.app.lacroi.io](http://www.app.lacroi.io) has no control over the Linked Sites and accepts no responsibility for them or for any loss or damage that may arise from your use of them. Your use of the Linked Sites will be subject to the terms of use and service contained within each such site.

### Personal Information

Privacy in LacRoi is committed to protecting your privacy. We firmly believe that electronic security and privacy are necessary for the continued success of the Internet. In support of this, we only use the personal information that you provide to create a more personalized experience for you, in accordance with the terms outlined below. → DU (Data Usage)

What information do we collect?

When a new user signup on our Web site or Extension, we need to know your name, email address, phone number. This information is necessary for us to process and fill your profile and to keep you informed of the status of your account.

When a new user get a subscription on our Secure Web site, we need to know your name, email address, phone number, Credicard Number, and expiration Date, this information is necessary for us to process your subscription through our Stripe Service to charge secure payments. → DC (Data Collection), PI (Personal Information)

What do you have access to?

While we do store your data, you have certain rights to the data that we collect and store. Those rights include; (1) erasure - where you can have us delete your data, (2) correction - where you can request that your data be changed, (3) access - where you can see your data that we have stored, and (4) export - where we can export your data to you in a usable format. → DSR (Data Subjects Rights) You can reach us with any questions, requests, or comments at [ty@lacroi.io](mailto:ty@lacroi.io) → CI (Contact Information)

### Information Security

All information is transmitted via SSL protocol (Secure Sockets Layer), all communication is encrypted between the client and server, thus keeping sensitive user information safe.

### Prohibitions

You must not misuse this Website. You will not: commit or encourage a criminal offense; transmit or distribute a virus, trojan, worm, logic bomb or any other material which is malicious, technologically harmful, in breach of confidence or in any way offensive or obscene;

hack into any aspect of the Service; corrupt data; cause annoyance to other users; infringe upon the rights of any other person's proprietary rights; send any unsolicited advertising or promotional material, commonly referred to as "spam"; or attempt to affect the performance or functionality of any computer facilities of or accessed through this Website. Breaching this provision would constitute a criminal offense and [www.app.lacroi.io](http://www.app.lacroi.io) will report any such breach to the relevant law enforcement authorities and disclose your identity to them.

We will not be liable for any loss or damage caused by a distributed denial-of- service attack, viruses or other technologically harmful material that may infect your computer equipment, computer programs, data or other proprietary material due to your use of this Website or to your downloading of any material posted on it, or on any website linked to it.

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### *Terms of Sale*

By placing an order you are offering to purchase a product on and subject to the following terms and conditions. All orders are subject to availability and confirmation of the order price. Dispatch times may vary according to availability and subject to any delays resulting from postal delays or force majeure for which we will not be responsible.

All customs and duty fees are your responsibility to pay. Shipping costs are non-refundable, which includes returns, package rejection upon arrival and/or failure to pay duty fees.

In order to contract with [\[www.app.lacroi.io\]](http://www.app.lacroi.io) you must be over 18 years of age and possess a valid credit or debit card issued by a bank acceptable to us. [www.app.lacroi.io](http://www.app.lacroi.io) retains the right to refuse any request made by you. If your order is accepted we will inform you by email and we will confirm the identity of the party which you have contracted with. This will usually be [www.app.lacroi.io](http://www.app.lacroi.io) or may in some cases be a third party. Where a contract is made with a third party [www.app.lacroi.io](http://www.app.lacroi.io) is not acting as either agent or principal and the contract is made between yourself and that third party and will be subject to the terms of sale which they supply you. When placing an order you undertake that all details you provide to us are true and accurate, that you are an authorized user of the credit or debit card used to place your order and that there are sufficient funds to cover the cost of the goods. The cost of foreign products and services may fluctuate. All prices advertised are subject to such changes.

### *(a) Our Contract*

When you place an order, you will receive an acknowledgement e-mail confirming receipt of your order: this email will only be an acknowledgement and will not constitute acceptance of

your order. A contract between us will not be formed until we send you confirmation by e-mail that the goods which you ordered have been dispatched to you. Only those goods listed in the confirmation e-mail sent at the time of dispatch will be included in the contract formed.

#### *(b) Pricing and Availability*

Whilst we try and ensure that all details, descriptions and prices which appear on this Website are accurate, errors may occur. If we discover an error in the price of any goods which you have ordered we will inform you of this as soon as possible and give you the option of reconfirming your order at the correct price or cancelling it. If we are unable to contact you we will treat the order as cancelled. If you cancel and you have already paid for the goods, you will receive a full refund. Delivery costs will be charged in addition; such additional charges are clearly displayed where applicable and included in the 'Total Cost'.

#### *(c) Payment*

Upon receiving your order we carry out a standard authorization check on your payment card to ensure there are sufficient funds to fulfil the transaction. Your card will be debited upon authorisation being received. The monies received upon the debiting of your card shall be treated as a deposit against the value of the goods you wish to purchase. Once the goods have been despatched and you have been sent a confirmation email the monies paid as a deposit shall be used as consideration for the value of goods you have purchased as listed in the confirmation email.

#### *(e) Price Adjustment Policy*

If within seven days of your order date, we reduce the price of an item you purchased, we'll happily adjust the sale price for you.

Please note that we can only make one sale adjustment per item. The item must be in the same color and size, and in stock. Please contact customer service and request a price adjustment while the item is still at the reduced sale price.

#### *Disclaimer of Liability*

The material displayed on this Website is provided without any guarantees, conditions or warranties as to its accuracy. Unless expressly stated to the contrary to the fullest extent permitted by law app.lacroi.io and its suppliers, content providers and advertisers hereby expressly exclude all conditions, warranties and other terms which might otherwise be implied by statute, common law or the law of equity and shall not be liable for any damages whatsoever, including but without limitation to any direct, indirect, special, consequential, punitive or incidental damages, or damages for loss of use, profits, data or other intangibles, damage to goodwill or reputation, or the cost of procurement of substitute goods and services, arising out of or related to the use, inability to use, performance or failures of this Website or the Linked Sites and any materials posted thereon, irrespective of whether such damages were foreseeable or arise in contract, tort, equity, restitution, by statute, at common law or otherwise. This does not affect [Your Online Store URL]'s liability for death or personal injury arising from its negligence, fraudulent misrepresentation, misrepresentation as to a fundamental matter or any other liability which cannot be excluded or limited under applicable law.



### *Linking to this Website*

*You may link to our home page, provided you do so in a way that is fair and legal and does not damage our reputation or take advantage of it, but you must not establish a link in such a way as to suggest any form of association, approval or endorsement on our part where none exists. You must not establish a link from any website that is not owned by you. This Website must not be framed on any other site, nor may you create a link to any part of this Website other than the home page. We reserve the right to withdraw linking permission without notice.*

*Disclaimer as to ownership of trade marks, images of personalities and third party copyright Except where expressly stated to the contrary all persons (including their names and images), third party trade marks and content, services and/or locations featured on this Website are in no way associated, linked or affiliated with [www.app.lacroi.io](http://www.app.lacroi.io) and you should not rely on the existence of such a connection or affiliation. Any trade marks/names featured on this Website are owned by the respective trade mark owners. Where a trade mark or brand name is referred to it is used solely to describe or identify the products and services and is in no way an assertion that such products or services are endorsed by or connected to [www.app.lacroi.io](http://www.app.lacroi.io).*

### *Indemnity*

*You agree to indemnify, defend and hold harmless [www.app.lacroi.io](http://www.app.lacroi.io), its directors, officers, employees, consultants, agents, and affiliates, from any and all third party claims, liability, damages and/or costs (including, but not limited to, legal fees) arising from your use this Website or your breach of the Terms of Service.*

### *Variation*

*[www.app.lacroi.io](http://www.app.lacroi.io) shall have the right in its absolute discretion at any time and without notice to amend, remove or vary the Services and/or any page of this Website.*

### *Invalidity*

*If any part of the Terms of Service is unenforceable (including any provision in which we exclude our liability to you) the enforceability of any other part of the Terms of Service will not be affected all other clauses remaining in full force and effect. So far as possible where any clause/sub-clause or part of a clause/sub-clause can be severed to render the remaining part valid, the clause shall be interpreted accordingly. Alternatively, you agree that the clause shall be rectified and interpreted in such a way that closely resembles the original meaning of the clause /sub-clause as is permitted by law.*

### *Complaints*

*We operate a complaints handling procedure which we will use to try to resolve disputes when they first arise, please let us know if you have any complaints or comments.*

### *Waiver*

*If you breach these conditions and we take no action, we will still be entitled to use our rights and remedies in any other situation where you breach these conditions.*

### *Entire Agreement*

*The above Terms of Service constitute the entire agreement of the parties and supersede any and all preceding and contemporaneous agreements between you and [www.app.lacroi.io](http://www.app.lacroi.io). Any waiver of any provision of the Terms of Service will be effective only if in writing*

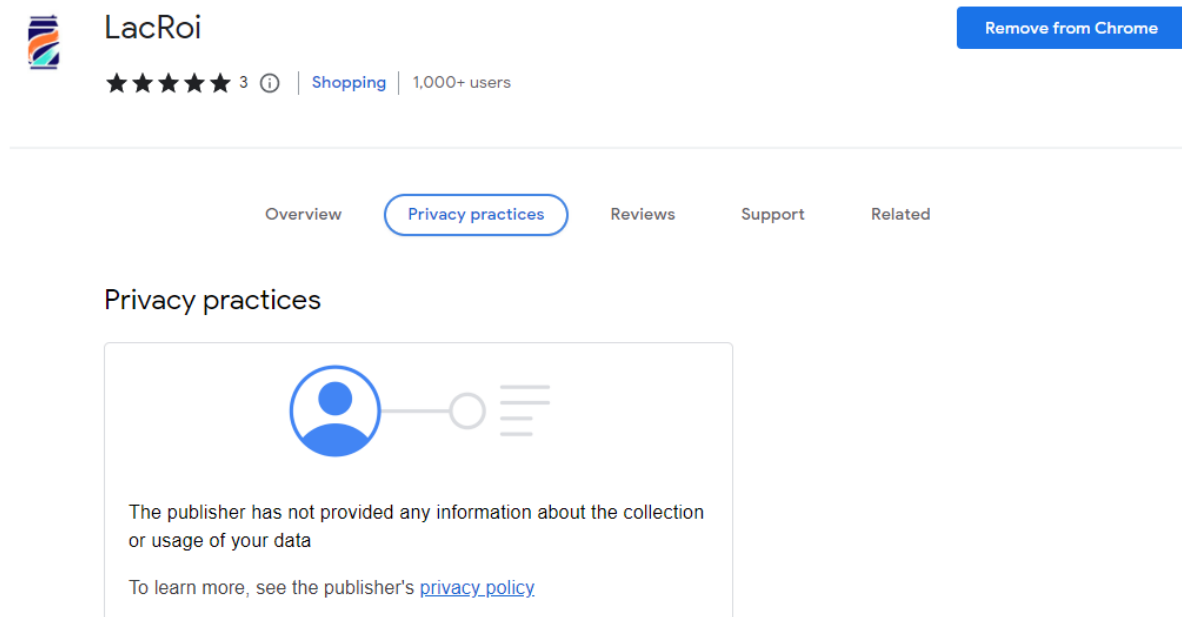
Incompliance explanation:

$\Pi_{\text{LacRoi}} = \{\text{DC, DU, CI, DSR}\}$ , this privacy policy is lack of label DR.

Meanwhile, the data collection part states the collection of PI.

### 3. Privacy Practice Summary

The screenshot of privacy practice summary from Chrome Web Store:



Incompliance explanation:

DC label is in privacy policy  $\Pi$ ; however, the data controller does not provide the specific data types in PPS. In privacy policy, the controller states they collect 1 type of personal data PI. In PPS, the controller does not specify any type of personal data.

### 4. Privacy Practice

Source code

Located at `./manifest.json` :

```
"permissions": [ "tabs", "activeTab", "storage",
```

Located at `./src/js/bestdeals.js` :

```
chrome.storage.local.get({
  lacroi_user: ""
}, function(auth) {

chrome.storage.local.set({
  "product": ""
}, function() {
```

→ AI (Activity Information)

Located at `./login.html` :

```
<input id="nameCreate" type="text" name="name" autofocus="
autofocus" class="form-control" style="background-image:">
```

→ PI (Personal Information)

```
<input id="createMail" type="email" name="email" class="
form-control">
```

→ PI (Personal Information)

Incompliance explanation:

The extension requests for Storage permission, and user “chrome.storage ” APIs to store and retrieve user data from the client side. The permission and APIs indicate the collection of personal data with label {AI}; however, this label is not specified in neither privacy policy nor PPS.

## 5. Conclusion

For privacy policy, *LacRoi* is lack of label DR, and only declares the collection of {PI}.

For privacy practice summary, *LacRoi* doesn’t declare any collection of user data.

For privacy practice, *LacRoi* collects more user data in practice (founded in source code with {AI, PI}) compared to that in the privacy policy {PI}, and privacy practice summary {∅}.