

TrendLife App Privacy Notice

Last Updated: August 11, 2026

This Privacy Notice describes how Trend Micro Incorporated and our subsidiaries and affiliated companies (collectively, “**Trend Micro**,” “**we**,” or “**us**”) collect, use, disclose, and otherwise process information about you when you access or use our TrendLife App, including our AI assistant, Kaleida (the “**TrendLife App**” or our “**Services**”) and when you otherwise interact with us about our Services, such as through our customer support channels or on social media.

We may change this Privacy Notice from time to time. If we make changes, we will notify you by revising the date at the top of this policy. If we make material changes, we will provide you with additional notice (such as by adding a statement to the Services or sending you a notification). We encourage you to review this Privacy Notice regularly to stay informed about our information practices and the choices available to you.

We may provide different or additional notices of our privacy practices for certain offerings. For example, we also have a Global Privacy Notice available at trendmicro.com/privacy. In the event of any conflict between that notice and this one, this TrendLife App Privacy Notice governs.

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COLLECTION OF INFORMATION

The information we collect about you depends on how you interact with us. In this section, we describe the categories of information we collect and the sources of this information.

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information directly from you when you create an account, fill out a form, submit or post content through our Services (including communicating with Kaleida), communicate with us via third-party platforms, request customer support, provide feedback on our Services, or otherwise communicate with us. The types of information that we collect directly from you include your name, email address, date of birth, age, preferred language, gender if provided, names and ages of family members, and any other information you choose to provide. When you communicate with Kaleida, we collect whatever information you choose to provide to Kaleida, including any images or voice input you provide. Depending on what you choose to communicate with Kaleida about, the information we collect may include sensitive topics such as health.

Information We Collect Automatically

We automatically collect information about your interactions with us or our Services, including:

- **Device, Usage, and Activity Information.** We collect information about how you access our Services, including data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device identifiers, and app version. We also collect information about access dates and times and your activity on our Services.
- **Information Collected by Tracking Technologies.** We use tracking technologies, such as SDKs, to collect information about you (including your gender, interests, and language) and your interactions with the Services. These technologies help us improve our Services, personalize your experience, and analyze your interactions with us, including to see which areas and features of our Services are popular.
- **Your Device Content.** With your permission, we collect information and content stored on your device, such as from your camera roll and files so that you can upload pictures and PDFs to the Services.
- **Security Features Data.** The TrendLife App provides access to certain Trend Micro security features to help users detect or block suspicious texts, calls, deepfakes, and websites. When you enable these security features, we collect information for them, including the content of messages from unknown senders, caller information, URLs you visit, and personal identifiers you ask us to monitor.

Information We Collect from Other Sources

We obtain information from other sources. For example, we may collect information from other users of the Services in your family group. This information includes your name, age, and relationship to the user, and any other information about you someone else in your family group may provide about you, such as from their communications with our AI Assistant, Kaleida, their linked calendar, or other use of the TrendLife App, or we derive it from information they provide.

Additionally, if you connect the Services to a third-party platform (such as Google), we will have access to certain information from that platform, such as your calendar events and any other information the third-party platform discloses about you, in accordance with the authorization procedures determined by such platform.

Information We Derive

We may derive information or draw inferences about you based on the information we collect. For example, we may make inferences about you, including relating to you and your family's schedule, health, school, work, safety, and emergencies, based on your prompts and interactions with Kaleida and other information you provide, including your calendar information if you enable the calendar integration with Google.

USE OF INFORMATION

We use the information we collect to:

- Provide, maintain, and improve our Services, including to develop, operate, and improve our features.
- Develop new products and services.
- Personalize and improve your experience with us.
- Send you technical notices, security alerts, support messages, and other transactional or relationship messages.
- Respond to your comments, questions, and requests and provide customer support.
- Send you marketing communications (see the [Your Choices](#) section below for information about how to opt out of these communications at any time).
- Monitor and analyze trends, usage, and activities in connection with our products and services.
- Provide, operate, and improve our security features, including to enhance our detection of threats such as spam, scams in suspicious texts or calls, deepfakes, and malicious websites.
- Detect, investigate, respond to, prosecute, and help protect against security incidents and other malicious, deceptive, fraudulent, or illegal activity, and help protect the rights and property of Trend Micro and others.
- Comply with our legal and financial obligations.
- Carry out any other purpose described to you at the time the information was collected.

DISCLOSURE OF INFORMATION

We disclose information about you in the following scenarios:

- **Family Group Members.** If you direct Kaleida to share information with your family group, we disclose to your family group information derived from your interactions with Kaleida, as directed by you. Separately, for users under the age of 18, we share a weekly summary of the child's progress and engagement with the Learning Buddy feature of Kaleida with the family group's plan owner. When you enable our security features, detection and alert information may be shared with your family group's plan owner.
- **Vendors and Service Providers.** We make personal information available to our vendors, service providers, contractors and consultants who perform services on our behalf, such as companies that assist us with hosting, fraud prevention, customer service, analytics, and marketing and advertising. When you engage with Kaleida, we remove certain personal identifiers (e.g., last name, email address, phone number, date of birth) from conversations before they are sent to a large language model provider for processing to produce Kaleida's responses to you. If you request directions to or from an address using Kaleida, we use a mapping service to enable Kaleida to provide the requested information.
- **Integration Partners.** If you choose to use integrations we offer on our Services, such as the calendar integration with Google, we provide certain information to the integration partners.
- **Authorities and Individuals Involved in Legal Proceedings.** We disclose personal information in response to a request for information if we believe that disclosure is in accordance with, or required by, any applicable law, regulation, or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements.
- **Protection of the Rights of Trend Micro and Others.** We may disclose personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Trend Micro, our users, the public, or others.
- **Professional Advisors.** We disclose personal information to our legal, financial, insurance, and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.

- **Corporate Transactions.** We may disclose personal information in connection with, or during negotiations of, certain corporate transactions, including a merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- **Corporate Affiliates.** Personal information is disclosed between and among Trend Micro and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership.
- **With Your Consent or at Your Direction.** We make personal information available to third parties when we have your consent or you intentionally direct us to do so.

Where permitted, we may also disclose aggregated or de-identified information that cannot reasonably be used to identify you. We maintain and use this information only in a de-identified fashion and will not attempt to re-identify such information, except as permitted by law.

DATA RETENTION

We store personal information associated with your account for as long as your account remains active. If you close your account, we will delete personal information related to your account within 30 days; otherwise, we will delete this information after two years of account inactivity. There might be some latency in deleting information from our servers and back-up storage; and we may retain this information for longer if necessary to comply with our legal obligations.

We store other personal information for as long as necessary to carry out the purposes for which we originally collected it and for other business purposes explained in this Privacy Notice.

CHILDREN UNDER 13

Parental Consent

Parents and guardians can create profiles under their account for a child who is under 13 years of age so that their child can use the Services after providing their verifiable parental consent. We do not otherwise knowingly collect personal information from children under 13. This section of our Privacy Notice explains to parents and guardians who have enabled such profiles for their children how Trend Micro collects, uses, and discloses personal information in connection with such children's profiles.

Collection

To create your child's profile associated with your account, we collect your child's first name, age and relationship type (e.g., son, daughter). Through your child's use of the Services, we may also collect:

- The content of your child's conversations with Kaleida. Depending on what your child chooses to communicate with Kaleida about, this may include sensitive topics such as health.
- Any images or files your child uploads in their conversations with Kaleida, including any images of your child that your child chooses to provide.
- Audio files containing your child's voice if your child chooses to speak to Kaleida.
- Information about your child from their Google calendar if the integration with Google Calendar is enabled. (You or your child can revoke permission for this sharing by unlinking the calendar in the Services.)
- If security features are enabled in your child's TrendLife App, information about the websites your child visits, information about those who text or call (via voice or video) your child's device, the content of messages from unknown senders, URLs your child visits on their device, and any personal identifiers we are asked to monitor with our security features. (These features can be turned off in the settings on your child's device.)
- Technical information about how your child accesses the TrendLife App (e.g., device brand and model, operating system version, mobile network, IP address, country, unique device identifiers, and app version), information about access dates and times, and their activity on the TrendLife App (such as pages viewed and session duration).
- Information we derive about your child from their communications with Kaleida or other use of the TrendLife App.
- Information about your child from other members of your family group to the extent they provide it in their communications with Kaleida, their linked calendar, or other use of the TrendLife App, or we derive it from information they provide.

Use

We do not use your child's information for advertising, make your child's information public, or offer functionality for your child or other users to make your child's information public through the TrendLife App. We use your child's information to provide and maintain and improve the Services, such as:

- Responding to your child's comments, questions, requests and other interactions with the TrendLife App, including Kaleida.

- Generating information to share with you or a member of your family group as described in [Disclosure](#) below.
- If enabled, supporting calendar scheduling and other integrated services.
- If enabled, detection of threats such as spam, scams, and malicious websites.
- Providing, understanding, and improving TrendLife App functionality.

Disclosure

We disclose information collected from your child as follows:

- **Family Group Members.** We share a weekly summary of your child's progress and engagement with the Learning Buddy feature of Kaleida with your family group's plan owner. If your child directs Kaleida to share information with your family group, we disclose to your family group information derived from your child's interactions with Kaleida, as directed by your child. We will not share your child's weekly summary with your broader family group only the group's plan owner. If security features are enabled in your child's TrendLife App, detection and alert information will be sent to the family group's plan owner.
- **Service Providers.** We use service providers to process information on our behalf and on our instructions. These providers may use your child's information only as necessary to deliver these services to us. For example, when your child engages with Kaleida, we send their conversations to a large language model provider for processing to produce Kaleida's responses to your child. We remove certain personal identifiers (e.g., last name, email address, phone number, date of birth) from conversations before they are sent to the large language model. If your child requests directions to or from an address using Kaleida, we use a mapping service to enable Kaleida to provide the requested information. We also share information with service providers who help us with technical functions, such as crash log reports, or help us analyze and measure usage trends and performance of the TrendLife App and improve the safety, reliability, and functionality of the TrendLife App.
- **Integrated Services.** If you enable connected services, such as Google Calendar, Kaleida shares information necessary to carry out the requests for those services.
- **Legal Requirements and Safety.** We may disclose your child's information in response to a request for information if we believe that disclosure is in accordance with, or required by, any applicable law, regulation, or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements, or where we believe disclosure is necessary to protect the rights, property, or safety of your child, our users, the public, or Trend Micro.
- **Corporate Transactions.** We may disclose your child's personal information in connection with, or during negotiations of, certain corporate transactions, including a merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

Retention and Deletion

We keep personal information collected from your child only for as long as is reasonably necessary to fulfill the specific purpose(s) for which it was collected. If you close your account or your child's profile, we will delete personal information related to your child's profile within 30 days. In addition, we will delete this information after two years of inactivity on your child's profile. Note that with the time frames referenced, there might be some latency in deleting information from our servers and back-up storage; and we may retain information for longer if necessary to comply with our legal obligations.

Parental Rights

As your child's parent or legal guardian, you may at any time seek to review the personal information we have collected from your child, refuse to permit any further collection or use of that information, and direct us to delete it by contacting us at privacy@trendmicro.com. Please note that if you delete certain information or refuse to permit further collection or use of your child's information, we may no longer be able to provide the TrendLife App to your child. In addition, depending on your jurisdiction, you may have the right to have inaccurate information corrected. (Depending on your jurisdiction, your child may have similar rights of their own.)

More Information

For more information on how we handle information of users of the TrendLife App generally, please review the other sections of this Privacy Notice, and if you have any questions about how we handle your child's personal information, please contact us at privacy@trendmicro.com.

If you are a child under 13 or a teen under 18, see TrendLife Privacy Explained for Children and Teens [here](#).

YOUR CHOICES

Account Information

At any time, you may ask Kaleida to stop sharing with your family group any information that you previously directed Kaleida to share, to delete information derived from your communications with Kaleida, or to delete your prior chats with Kaleida. You may also leave your family group and delete your account and its personal information.

Communications Preferences

You may opt out of receiving text messages or promotional emails from Trend Micro by following the instructions in those communications or by managing your communication preferences in your account settings menu. If you opt out, we may still send you non-promotional emails, such as those about your account.

Mobile Push Notifications

With your permission, we may send push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

ADDITIONAL INFORMATION FOR SPECIFIC JURISDICTIONS

Individuals Residing in Certain U.S. States

Certain U.S. states have enacted privacy laws that grant their residents certain rights and require specific disclosures ("**State Privacy Laws**"). If you reside in California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, this section applies to you. This section also serves as our California notice at collection.

Additional Disclosures

Our Privacy Notice above explains how we [collect](#), [use](#), and [disclose](#) information about you. As required by certain State Privacy Laws, we use the tables below to explain this same information.

Use and Disclosure of Personal Information for Business Purposes

<i>Category of Personal Information</i>	<i>Use of Personal Information</i>	<i>Categories of Recipients</i>
Identifiers (such as name, email address) Demographic data (such as age and gender) Inferences Sensitive data (such as information relating to a known child) Usage and activity information, including security feature data	• Provide, maintain, and improve our Services; • Develop new products and services; • Personalize and improve your experience with us; • Communicate with you; • Monitor and analyze trends, usage, and activities in connection with our products and services; • Provide, operate, and improve our security features, including to enhance our detection of threats such as spam, scams, and malicious websites; • Detect, investigate, respond to, prosecute, and help protect against	• Vendors and Service Providers that assist us with producing Kaleida's responses, hosting, fraud prevention, customer service, analytics, and marketing and advertising. • Other Users. When you communicate with Kaleida through the Services, we may disclose information derived from those interactions with other family members that use the TrendLife App. • Integration Partners. If you choose to use integrations we offer on our Services, such as the calendar integration with Google, we provide certain information to the integration partners.

<i>Category of Personal Information</i>	<i>Use of Personal Information</i>	<i>Categories of Recipients</i>
	security incidents and other malicious, deceptive, fraudulent, or illegal activity, and help protect the rights and property of Trend Micro and others; • Comply with our legal and financial obligations; • Create de-identified and aggregate data that cannot reasonably be linked to you; and • Carry out any other purpose described to you at the time the information was collected.	

While we collect information that is considered “sensitive” under State Privacy Laws, we do not use or disclose sensitive personal information for the purpose of inferring characteristics about you.

As described in the [Collection of Information](#) section above, we collect personal information from various sources, including directly from you, automatically when you access or use our Services, and from third-party sources.

We retain personal information as described in the [Data Retention](#) section above.

Sales, Sharing, and Targeted Advertising Activities

We do not disclose personal information to show you targeted ads on third-party properties or otherwise engage in “sales,” “sharing,” or use of personal information for “targeted advertising” under State Privacy Laws. As such, we do not engage in sales, sharing, or targeted advertising using personal information about consumers we know to be under the age of 18.

Your Rights Under State Privacy Laws

Access, Correction, and Deletion

You have the right to (1) request to know more about and access your personal information, including in a portable format, (2) request deletion of your personal information, and (3) request correction of inaccurate personal information. Residents of Connecticut, Minnesota, Oregon, and Rhode Island may also request a list of third parties to whom we have disclosed personal data.

To make any of these requests, call 1-800-864-6027 or email us at privacy@trendmicro.com. To authenticate your request, we may ask you for information related to your interactions with us.

Nondiscrimination

We will not discriminate against you for exercising your privacy rights.

Appeals

If we deny your request, you may appeal our decision by contacting us at 1-800-864-6027 or email us at privacy@trendmicro.com. If you have concerns about the result of an appeal, you may contact the attorney general in the state where you reside.

Authorized Agents

If you reside in California, you may also designate an authorized agent to submit an access, deletion, or correction request on your behalf. We may ask authorized agents to submit proof of their authority to make a request, such as a valid power of attorney or proof that they have signed permission from the consumer who is the subject of the request. In some cases, we may contact the individual who is the subject of the request to verify such individual’s own identity or confirm the authorized agent has permission to submit the request. If you are an authorized agent seeking to make an access, correction, or deletion request on behalf of a California resident, please call 1-800-864-6027 or email us at privacy@trendmicro.com.

Individuals in the UK and EU

If you are located in the UK or the EU, this additional section applies to you.

Trend Micro Incorporated is the data controller for the personal data we collect and process when you access, use or interact with our Services. You can contact us at:

Data Protection Office; FAO of Lianne Harcup (DPO)
Trend Micro EMEA Limited
Median House
IDA Business & Technology Park
Model Farm Road
Cork, Ireland
DPO_EU@trendmicro.com

For Trend Micro Deutschland:
HEC Harald Eul Consulting GmbH
Harald Eul
Auf der Höhe 34
50321 Brühl
Deutschland
Datenschutz-TrendMicro@he-c.de

Information We Process and Others

For details on the categories of personal data we collect, please see the [Collection of Information](#) section of this Privacy Notice. This includes information you provide to us, information we automatically collect, and information we collect from other sources. If you do not provide required information, we may be unable to provide the relevant Services, complete your request, or comply with our legal obligations. Other information is optional, but some features or communications may not be available without it.

In the section of this Privacy Notice regarding [Disclosure of Information](#) you will see details of the categories of recipients of the personal data we process.

For details on our data retention practices, please see the [Data Retention](#) section of this Privacy Notice.

Legal Basis for Processing

We process your personal data as described above for the purposes listed in the table below. We do so in reliance on the following lawful bases:

Purpose	Lawful Basis
Provide our Services, including providing, and operating our security features	To perform our responsibilities under our contract with you
To maintain and improve our Services and develop new products and services	Legitimate interest in improving our products and services
Communicate with you through Kaleida	Your consent. You may withdraw such consent at any time
Personalize and improve your experience with us	Legitimate interest in improving user experience in our products and services
Send you technical notices, security alerts, support messages, and other transactional or relationship messages	To perform our responsibilities under our contract with you
To respond to your requests or inquiries	Legitimate interest in communicating with you
To communicate with you about products and services offered by Trend Micro and others that we think will interest you	Your consent. You may withdraw such consent at any time

Purpose	Lawful Basis
Monitor and analyze trends, usage, and activities in connection with our products and services	Your consent. You may withdraw such consent at any time
Improve our security features, including to enhance our detection of threats such as spam, scams, and malicious websites	Legitimate interest in preventing cyber security attacks or fraud
Detect, investigate, respond to, prosecute, and help protect against security incidents and other malicious, deceptive, fraudulent, or illegal activity, and help protect the rights and property of Trend Micro and others	Legitimate interest in safeguarding our assets and employees
Comply with our legal and financial obligations	Compliance with a legal obligation
Establish, defend, or enforce legal claims or regulatory investigations	Legitimate interest in protecting our commercial and legal interests

Data Subject Requests

Subject to certain limitations, you have the following rights regarding your personal data:

- **Access.** To obtain a copy of the personal data we hold about you.
- **Rectification.** To have inaccurate personal data corrected.
- **Erasure.** To have your data deleted, where applicable.
- **Restriction.** To limit our processing of your data in certain cases.
- **Objection.** To object to processing based on our legitimate interests, including objecting at any time to processing of your personal data for direct marketing purposes.
- **Data Portability.** To receive the data you provided to us, in a structured, commonly used, machine-readable format, and to have it transmitted to another organization when technically feasible.
- **Withdraw Consent.** If we rely on consent, you may withdraw it at any time.

To exercise any of these rights, please call 1-800-864-6027 or email us at privacy@trendmicro.com.

Supervisory Authority

If you have a concern about our processing of personal data, we encourage you to contact us in the first instance. However, you have the right to lodge a complaint with the Data Protection Authority where you reside. Contact details for your Data Protection Authority can be found using the links below:

For individuals in the European Union: https://www.edpb.europa.eu/contact/contact-dpas_en

For individuals in the UK: <https://ico.org.uk/global/contact-us/>

For individuals in Switzerland: <https://www.edoeb.admin.ch/en/contact-2>

International Transfers

Trend Micro is based in the United States, and we and our service providers process and store personal information on servers located in the United States and other countries. Whenever we make restricted international transfers of personal information, we take steps to ensure that your personal information receives an adequate level of protection (by putting in place appropriate safeguards, such as contractual clauses) or ensure that we can rely on an appropriate derogation under data protection laws. Where relevant, you may request access to any safeguard which we use to transfer your personal information outside of the European Economic Area, the United Kingdom, or Switzerland (although we may need to redact data transfer agreements for confidentiality reasons).

CONTACT US

If you have questions about this Privacy Notice, please contact us at privacy@trendmicro.com.