For commercial and privacy reasons, reputation matters - VPNs should be clear about what the individuals in charge of running and security a VPN are actually the company. The more information a VPN can make available about its employees, the better. We have seen different degrees of transparency across the board.

This also includes both the legal and operational roles of the company, specifically names who are responsible for operating the company and managing security, and whether the VPN is part of a larger company.

SECURITY PROTOCOLS & PROTECTIONS

ExpressVPN is operated by ExpressVPN International Ltd, a privately held British Virgin Islands company. ExpressVPN's leadership team and owners are not involved in any other company or product directly involved in operating the VPN service.

VyprVPN is operated by VyprVPN Limited. VyprVPN Limited has no parent or holding company. The legal name of the company is Privatus Limited. Privatus Limited has no parent or holding company. There are no other companies or partners directly involved in operating the VPN service.

The legal name of the company is Kryptos AG and it is directly owned by the founders Fredrik Strömberg and Daniel Berntsson. Amagicom AB is a fully owned subsidiary.

Mullvad is a corporation in the EU which is directly owned by the founders Daniel Strömberg, Fredrik Strömberg and Daniel Berntsson. Mullvad is independently owned with no Torvald customer information shared with McAfee.

TunnelBear’s team and offices are based in Toronto, Canada with the company’s Torvald is, in clear disclosure, independently owned with no TORVALD customer information shared with McAfee.

Goldberg, S. Goldberg is the full-time owner of the company that offers VyprVPN. You can have more details about our team and company’s ownership in our About Us page.

We do not have economic stakes in other VPN providers and they do not share any user information with any other VPN service.

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<table>
<thead>
<tr>
<th>CORPORATE ACCOUNTABILITY &amp; BUSINESS MODEL</th>
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<tr>
<td>What is the public facing and full legal name of the VPN service and any parent or holding companies?</td>
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<tr>
<td>Does the company, or other companies involved in the operation or ownership of the service, have any ownership in VPN review websites?</td>
</tr>
</tbody>
</table>

**InvinciBull by Finjan Mobile, Inc.**

InvinciBull by Finjan Mobile, Inc. is a service of Finjan Holdings, Inc., a NASDAQ company (NASDAQ: FNJN). Finjan licenses the VPN network from partner Avira.

Finjan Mobile, InvinciBull or Avira do not operate, own, nor do they have any involvement in VPN review websites.

<table>
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<tr>
<th>PRIVACY: Logging/Data Collection Practices and Responding to Law Enforcement</th>
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<tr>
<td>Does the service store any data or metadata generated during a VPN session (from connection to disconnection) after the session is terminated? If so, what data?</td>
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<tr>
<td>Does your company store (or share with others) any user browsing and/or network activity data, including DNS lookups and records of domain names and websites visited?</td>
</tr>
<tr>
<td>Do you have a clear process for responding to legitimate requests for data from law enforcement and courts?</td>
</tr>
</tbody>
</table>

InvinciBull does not store nor share if it is any data or metadata generated during a service session. InvinciBull requires users to register for the service, and遂 to date of registration, last log on and whether or not users paid for a subscription and/or participated in promotions.

Furthermore the company does not store, nor does it share with others any user browsing and/or network activity data, including DNS lookups and records of domain names and websites visited.

Finjan Holdings (InvinciBull’s parent company) may store your email address. If Finjan believes that such doing is required by law, we will take reasonable steps to notify you. Finjan is required to provide your personal information to third parties as part of legal proceedings. Finjan also may use and disclose your information as permitted in the production of documents or Affidavits in any legal proceedings.

Additionally, Finjan Holdings may store your email address. Finjan is required to provide your personal information to third parties as part of legal proceedings. Finjan also may use and disclose your information as permitted in the production of documents or Affidavits in any legal proceedings.

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<th>SECURITY PROTOCOLS &amp; PROTECTIONS</th>
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<tr>
<td>For example, is the sole source of the service’s revenue from consumer subscriptions?</td>
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</table>

The sole source of InvinciBull VPN revenue is from consumer subscription, InvinciBull operates as a freemium model.

InvinciBull does not store nor does it track any data or metadata generated during a VPN session, nor after the session is terminated. We require an email to register for the service, and know the date of registration, last log on and whether or not users paid for a subscription and/or participated in promotions.

Finjan Holdings (InvinciBull’s parent company) may store your email address.
Several practices CDT thinks are important to look out for include preventing and responding to software update issues, ensuring that all vulnerabilities are addressed, and monitoring for unusual activity. These practices include:

1. Fast patching, made possible through automatic provisioning and deployment systems, which can examine, install, and reconfigure systems in a matter of hours.
2. Hardened OS and applications, which minimizes the potential damage if a system were to be compromised.
3. Limiting the length of time that a system can remain compromised, which means neither data nor access by hackers can persist on encrypted communications (learn more here: https://www.expressvpn.com/blog/perfect-forward-secrecy/).
4. Enforcement of 2FA for system access.
5. Access control using a private VPN with RSA 4096 certificates for communications (learn more here: https://www.expressvpn.com/blog/reason-vpns-are-safe/).
InvinciBull is committed to protecting against unauthorized access to customer data flows over the VPN. InvinciBull does not have access to our customers' data flows, and we do not store it. All data that passes through the InvinciBull VPN is encrypted through patented, military-grade AES 256-bit encryption, and thus no one can see it.
<table>
<thead>
<tr>
<th>Service</th>
<th>Date Responses Reviewed</th>
<th>Oct. 17, 2018</th>
<th>Oct. 17, 2018</th>
<th>Oct. 17, 2018</th>
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</thead>
<tbody>
<tr>
<td>ExpressVPN</td>
<td></td>
<td>We work to empower customers to protect their privacy and security in every aspect of what we do. In addition to those we've mentioned in previous answers, some other ways we do this include:</td>
<td>▸ Open-source leak testing tools, aimed at enabling reviewers and other third parties to independently verify leakproofing claims, providing insight into what our engineers work on to protect users, and doing so for the entire VPN industry.</td>
<td>▸ Accepting of Bitcoin as payment for those seeking to increase their anonymity.</td>
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</table>

**What other controls does the service use to protect user data?**

We work to empower customers to protect their privacy and security in every aspect of what we do. In addition to those we've mentioned in previous answers, some other ways we do this include:

- Open-source leak testing tools, aimed at enabling reviewers and other third parties to independently verify leakproofing claims, providing insight into what our engineers work on to protect users, and doing so for the entire VPN industry.
- Accepting of Bitcoin as payment for those seeking to increase their anonymity.
- Comprehensive and transparent Privacy Policy explaining how we treat sensitive data, what we store and never store, and why.
- Transparency and disclosure to even when things go wrong, how we inform users, and other communications.
- Bug bounty program for any potential security vulnerabilities and fixes.
- Extensive guides to general privacy and security matters on our website, including a primer on how taking security for survivors of domestic violence, securing your mobile device, protecting your financial information, and other topics.
- Contributions to the VPN community, including helping to fund the Open Source Technology Improvement Funds (OSTIF) a non-profit organization dedicated to funding open-source software and other projects.
- TurkeyBear is proud to be the first and only VPN provider in the world that has released a public, full infrastructure security audit from a verified third party. We have hosted bug bounties, accept honey and Bitcoin as alternative payment options for privacy-conscious customers, and continue to have annual full audits of our system, apps and code.

All efforts are taken to protect user data and privacy.

**Additional details:**

- **IP addresses are logged:** We log IP addresses of all users in order to protect their privacy and security. This information is used only for purposes of technical support and troubleshooting.
- **Third-party access:** We do not share any user data with third parties for any purpose.
- **Data retention:** We do not retain any user data beyond what is necessary to provide the service.
- **Security measures:** We use industry-standard security measures to protect user data, including encryption, firewalls, and regular security audits.

**Additional resources:**

- **Website:** [https://www.tunnelbear.com](https://www.tunnelbear.com)
- **Blog:** [https://www.tunnelbear.com/blog](https://www.tunnelbear.com/blog)
- **Support:** [https://www.tunnelbear.com/support](https://www.tunnelbear.com/support)

We strive to provide the best possible service for our customers, and we take their privacy and security very seriously.
**What other controls does the service use to protect user data?**

Invincibull adheres to industry standard security protocols, backed up by a strong privacy policy, [https://ulm.finjanmobile.com/app-privacy-statement/](https://ulm.finjanmobile.com/app-privacy-statement/) clearly available to all, and to which we adhere. Our plans to protect customer information appear in our privacy policy and a statement clearly outlined at all, and to which we adhere. Our plans to protect customer information appear in our privacy policy and a statement clearly outlined at all, and to which we adhere. Our plans to protect customer information appear in our privacy policy and a statement clearly outlined at all, and to which we adhere. Our plans to protect customer information appear in our privacy policy and a statement clearly outlined at all, and to which we adhere.

Invincibull launched in September of 2018 and was independently audited by CybeRisk upon launch. We will continue to conduct periodic security audits of the site.

**How does Finjan and Finjan Mobile secure and safeguard your information and notify you of a data breach?**

Finjan uses, and requires that its service providers use, commercially reasonable physical, technical, administrative, and other safeguards designed to prevent unauthorized access to, use of, alteration of, or destruction of your information. In addition, we limit the use and disclosure of your personal information, and work to ensure that anyone with whom we share such information treats that information with the privacy and security it deserves.

To the extent applicable law requires that Finjan notify you, it may provide that notice directly or, if indirectly believed to have been acquired by an unauthorized person, Finjan will provide that notice by email using the latest available address you provided or, as otherwise required by law.

Additionally, Invincibull VPN adheres to these additional signals of trust through the use of open source code where possible, as stated in its End User License Agreement [https://www.invincibull.io/eula/](https://www.invincibull.io/eula/).