

VPN Trust Report

A test commissioned by AnchorFree and performed by AV-TEST GmbH
Date of the report: August 27th, 2018

Introduction

A Virtual Private Network is a tool to provide anonymity, protect privacy from ISPs and websites collecting user data, enable security on public Wi-Fi hotspots and circumvent geolocation blocks to avoid censorship. The technologies used and the reliability of the protection has been reviewed and assessed in our [previous report¹](#) and should only be one part of an overall review. This report is about the credibility and trust of companies providing VPN solutions. When using a VPN the user trusts handing over their privacy to an external private or public company. The VPN provider may be able to access what the user is aiming to protect from the Internet Service Provider and other parties. The VPN may be able to intercept, sent and received packages, and create a detailed map of the user's online behavior. Trust is hard to measure and particularly difficult when we have no insights into the concerned parties or when the Companies providing the VPN service are not transparent. In order to find a method of evaluating how trustworthy a company appears, the transparency in regards to management, the requests for data handling and further company details need to be evaluated. When general information like this, which is commonly known for most companies, is not publicly made available in a clear and obvious manner it raises questions of responsibility, credibility and trust.

¹ "VPN Comparative Test." AV-TEST, 15 June 2018, www.av-test.org/fileadmin/pdf/reports/AV-TEST_VPN_Comparative_Test_Report_June_2018_EN.pdf

Executive Summary

We evaluated the VPN tools on the following four criteria:

Transparency Report which provides information on official data requests and how they are handled. Only three products provide this information AnchorFree, Avast and Cisco and only AnchorFree states that no information at all has been shared.

Board of Directors is responsible for overseeing the activities of the company and is mentioned and listed by roughly half the tested products. Those are AnchorFree, Avast, Cisco, F-Secure, KeepSolid, Pulse Secure and Symantec.

In August 2018, AV-TEST performed a test of Virtual Private Networks (VPN) solutions. VPNs have been reviewed in different fields of data request transparency, management team and leadership and jurisdiction.

The presented evaluation assesses AnchorFree's Hotspot Shield Elite, Avast SecureLine, Avira Phantom VPN Pro, Cisco VPN, ExpressVPN, F-Secure FREEDOME VPN, KeepSolid's VPN Unlimited, London Trust Media's Private Internet Access, NordVPN, Pulse VPN, Symantec's Norton WiFi Privacy and Tunnel Bear now owned by McAfee.

The Management team runs the day to day business and every company has it in one form or another. Yet two vendors made no mention of it: ExpressVPN and NordVPN.

Investors trust a company enough to back it by acquiring a stake in that company. We found information for investors for several of the tested companies but the number of companies disclosing the actual investors is relatively low with two, those are AnchorFree and F-Secure.

The official office address is related to the jurisdiction as this will influence what data has to be stored or with whom it has to be shared. All vendors disclosed their official office locations and by extension the location of their jurisdiction.

We asked all vendors to comment on and confirm the findings of this report and that their main offices are indeed at the posted addresses. Five vendors replied and confirmed this, those were AnchorFree, Avast, Avira, KeepSolid and Symantec.

Overview

Transparency Report – Is a regular statement published by a company. The report informs about warrants, subpoenas and other requests for information by government agencies. It is very probable that a VPN provider will be confronted with such requests, so the report should include how the company has responded to the request and what information was disclosed. The statement is in retrospective for a period of time like every 6 or 12 months.

The statement may include the requesting authorities, the authorities' countries of origin, the number of requests, the amount and type of data handed over.

The Transparency report should be clearly marked as such and be a separate individual page or document.

Board of Directors - is an organised group of people jointly overseeing the activities of a company. The responsibilities of the board among others are to govern the company with respect to the objectives, broader policies, justify the company's actions and performance to the stakeholders and appoint a CEO. The boards' responsibilities may vary by jurisdiction.

The composition of the board member will be reflected in the company's strategic focus and orientation.

Management - is organising the day to day decision and activities. It may include the chief executive officer, chief financial officer, chief technology officer and others. They are responsible for achieving the objectives provided by the board of directors to whom they have to answer for performance and actions. The management team's skill set, experience and reputation directly reflect on the quality of the product and service provided.

Investors - are organisations or people backing an organisation with financial capital to gain influence, making a financial investment or for broader strategic reasons.

The money provided by investors can bring influence and therefore have a direct influence on the strategic orientation of the company.

Official location and Address of the company – Is the geographical location where the company is situated, often registered. From this usually the applied jurisdiction of the company results.

Jurisdiction - describes the region or country and the according law the organisation needs to adhere to. The jurisdiction usually derives from where the company is registered. The question of jurisdiction gets more complex with companies operating local branches in different jurisdictions. The jurisdiction provides the company with rights and obligations. For example, in VPN comparisons, a lot of emphases is put on intelligence agencies and agreements between different jurisdictions, which makes annual transparency reports a must to establish the trust of any VPN. Jurisdiction is also very important for what general consumer protections a company must abide by.

Ease of access to information – reflects how hard or easy the previously mentioned items can be found for the VPN provider.

Test Results

Avast – Avast SecureLine VPN

Default webpage: <https://www.avast.com>

Transparency Report

Link: <https://www.avast.com/transparency-report>

Frequency: Annual

Date: 2017, updated January 19, 2018

Included:

- Number of requests from intelligence agencies – 0
- Number of requests from law enforcements – 28
 - Countries of disclosure request
 - Czech Republic – 19
 - France – 3
 - Italy, Germany, Poland, Sweden, Netherlands, United States - 1
- Data disclosed – 1
 - Czech Republic – email + IP address

Data shared: Yes

Board of directors

Link: <https://investors.avast.com/our-story/leadership/board-of-directors/>,
<https://www.avast.com/about>

Frequency: Quarterly

Included: Name, Resume, time of employment

Management

Link: <https://investors.avast.com/our-story/leadership/leadership-team/>,
<https://www.avast.com/about>

Included: Name, Resume, time of employment

Investors

Link: Publicly traded company

Official location and Address

Link: <https://www.avast.com/contacts> (Avast Software s.r.o)

Country of residence: Czech Republic

Address: Enterprise Office Center, Pikrtova 1737/1A, 140 00 Prague 4

Additional addresses: 16

Jurisdiction (country of registration)

Link: <https://www.avast.com/contacts>

Country of jurisdiction: Czech Republic

Location Main offices

Location: Prague, Czech Republic (confirmed by vendor)

Ease of access to information

Transparency report: Easy – “About us”, “Transparency Report”

Board: Easy – “About us”, “About us”

Management: Easy – “About us”, “About us”

Investors: Not available

Official location and Address: Easy – “About us”, “Contact us”

Jurisdiction: Easy – “About us”, “Contact us”

[Avira – Avira Phantom VPN Pro](#)

Default webpage: <https://www.avira.com/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

Comment by Vendor in appendix

Board of directors

Link: Not available

Included: Not available

Comment by Vendor in appendix

Management

Link: <https://www.avira.com/en/about-avira>

Included: Name, Resume, time of employment

Investors

Link: Not available

Official location and Address

Link: <https://www.avira.com/en/contact> (Avira Operations GmbH & Co. KG)

Country of residence: Germany

Address: Tett nang, Kaplaneiweg 1, 88069 Tett nang, Germany

Additional addresses: USA, China, Romania, Netherlands

Jurisdiction (country of registration)

Link: <https://www.avira.com/en/contact>

Country of jurisdiction: Germany (14 eyes)

Location Main offices

Location: Germany, Kaplaneiweg 1, 88069 Tett nang (confirmed by vendor)

Ease of access to information

Transparency report: Not available

Board: Not available

Management: Easy – “About”

Investors: Not available

Official location and Address: Easy – “About, Contact”

Jurisdiction: Not available

Cisco – AnyConnect Secure Mobility Client

Default webpage: <https://www.cisco.com/>

Transparency Report

Link: https://www.cisco.com/c/dam/en_us/about/doing_business/trust-center/docs/lawful-enforcement-requests.pdf

Frequency: Twice a year

Date: 01.07.2017 – 31.12.2017

Included:

- National requests
 - Number of requests for Customer Data – 4, disclosed – 0
 - Number of requests for Non-Customer Data – 41, disclosed – 2
 - Number of requests for Emergencies – 0
 - Number of requests for National Security – 0
 - Number of CLOUD Act Requests – 0

- International Requests
 - Number of requests for Customer Data – 0, disclosed - 0
 - Number of requests for Non-Customer Data – 1, disclosed – No Information
 - Number of requests for Emergencies – 0
- Cisco states following definition for customer data – “Customer Data is all data (including text, audio, video or image files) that is provided to Cisco in connection with your use of our products or services. Customer Data does not include Administrative Data, Payment Data, Support Data or Telemetry Data, as defined in the Data Definitions document. Requests that do not fall into the Customer Data category are listed as “Non- Customer Data.””

Data shared: Yes

Board of directors

Link: <https://investor.cisco.com/investor-relations/governance/board-of-directors/default.aspx>

Included: Name, Resume, time of employment

Management

Link: <https://newsroom.cisco.com/exec-bios>

Included: Name, Resume, time of employment

Investors

Link: Publicly traded company

Official location and Address

Link: <https://www.cisco.com/c/en/us/about.html> (Cisco Systems, Inc.)

Country of residence: USA

Address: 170 West Tasman Dr., San Jose, CA 95134, USA

Additional addresses: Not available

Jurisdiction (country of registration)

Link: Not available

Country of jurisdiction: Not available

Location Main offices

Location: No confirmation from vendor

Ease of access to information

Transparency report: Easy – “ABOUT US, The Trust Center”, “Transparency Report”

Board: Easy – “Investor relations”, “Corporate Governance”, “Board of Directors”

Management: Easy – “ABOUT US, About Cisco”, “Executive Team”

Investors: Not available

Official location and Address: Easy – “ABOUT US, About Cisco”

Jurisdiction: Not available

ExpressVPN

Default webpage: <https://www.expressvpn.com/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

Board of directors

Link: Not available

Included: Not available

Management

Link: Not available

Included: Not available

Investors

Link: Not available

Official location and Address

Link: <https://www.expressvpn.com/> (ExpressVPN)

Country of residence: British Virgin Islands

Address: Not available

Additional addresses: Not available

Jurisdiction (country of registration)

Link: <https://www.expressvpn.com/privacy-policy#jurisdiction>

Country of jurisdiction: British Virgin Islands

Location Main offices

Location: No confirmation from vendor

Ease of access to information

Transparency report: Not available

Board: Not available

Management: Not available

Investors: Not available

Official location and Address: Easy – Main page

Jurisdiction: Easy – “About ExpressVPN, Privacy Policy”, “Jurisdiction and Applicable Law”

F-Secure – F-Secure FREEDOME VPN

Default webpage: <https://www.f-secure.com/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

Board of directors

Link: https://www.f-secure.com/en/web/investors_global/management/board-of-directors

Included: Name, Resume, time of employment

Management

Link: https://www.f-secure.com/en/web/investors_global/management/leadership-team

Included: Name, Resume, time of employment

Investors, Shareholders

Link: Publicly traded company, https://www.f-secure.com/en/web/investors_global/shareholders

Official location and Address

Link: https://www.f-secure.com/en/web/about_global/contact/offices (F-Secure Corporation)

Country of residence: Finland

Address: Tammasaarenkatu 7, P.O. Box 24, 00181 Helsinki, Finland

Additional addresses: 20 are mentioned on the webpage. According to F-Secure themselves it has recently been increased to 25+ (confirmed by vendor)

Jurisdiction (country of registration)

Link: <https://www.f-secure.com/en/web/legal/terms/software>

Country of jurisdiction: Finland

Location Main offices

Location: No confirmation from vendor

Ease of access to information

Transparency report: Not available

Board: Easy – “Investors”, “Management”, “Board of Directors”

Management: Easy – “Investors”, “Management”, “Leadership Team”

Investors: Easy – “Investors”, “Share”, “Shareholders”

Official location and Address: Easy – “Offices”

Jurisdiction: Medium – “Terms of service”, “Terms of services”

AnchorFree – Hotspot Shield Elite

Default webpage: <https://www.hotspotshield.com/>

Transparency Report

Link: <https://www.hotspotshield.com/privacy/>, version at the time of the report

https://www.hotspotshield.com/reports/AnchorFree_Transparency_Report-11292017.pdf

Frequency: Annual

Date: 29.11.2017, period 2017 until 31.10.2017

Included:

- Number of data requests– 81
- Data disclosed – 0
- Listing of requests per month
- Separated listing of requests by countries
 - United States – 62
 - France – 7
 - Germany – 3
 - India, UK – 2
 - Canada, Brazil, Switzerland, Czech Republic, Spain – 1
- Separated listing of requests by type
 - Search Warrant – 4
 - Court Order – 1
 - Subpoena – 38
 - Other – 38
- Definitions on the type of requests

Data shared: No

Board of directors

Link: <https://www.anchorfree.com/about/team/>

Included: Name, Resume, time of employment

Management

Link: <https://www.anchorfree.com/about/team/>

Included: Name, Resume, time of employment

Investors

Link: <https://www.anchorfree.com/about/team/>

Included: Name, Resume, time of employment

Official location and Address

Link: <https://www.anchorfree.com/about/contact/> (AnchorFree Inc.)

Country of residence: USA

Address: 1800 Seaport Blvd, Redwood City, CA 94063, USA

Additional addresses: Switzerland (Anchorfree GmbH), Ukraine

Jurisdiction (country of registration)

Link: <https://www.hotspotshield.com/terms/>

Country of jurisdiction: USA

Location Main offices

Location: 1800 Seaport Blvd, Redwood City, CA 94063, USA

Ease of access to information

Transparency report: Easy – “Privacy policy”, “Transparency Report”

Board: Easy – “About us”

Management: Easy – “About us”

Investors: Easy – “About us”

Official location and Address: Medium – “About us”, “Contact us” (different from “Contact us” on start page of Hotspotshield)

Jurisdiction: Easy – “Terms” ->search

NordVPN

Default webpage: <https://nordvpn.com/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Data shared: Not available

Included: Not available

Board of directors

Link: Not available

Included: Not available

Management

Link: Not available

Included: Not available

Investors

Link: Not available

Official location and Address

Link: <https://nordvpn.com/contact-us/> (NordVPN.com, Tefinkom co S.A)

Country of residence: Panama

Address: 50th Street Global Plaza Tower, Panama City, Panama

Additional addresses: Not available

Jurisdiction (country of registration)

Link: <https://nordvpn.com/terms-of-service/>

Country of jurisdiction: Panama

Location Main offices

Location: No confirmation from vendor

Ease of access to information

Transparency report: Not available

Board: Not available

Management: Not available

Investors: Not available

Official location and Address: Easy – “Contact Us”

Jurisdiction: Easy – “Terms of Services”

Symantec – Norton WiFi Privacy

Default webpage: <https://us.norton.com/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

Board of directors

Link: <https://www.symantec.com/about/corporate-profile/management-team>

Included: Name, Resume, time of employment

Management

Link: <https://www.symantec.com/about/corporate-profile/management-team>

Included: Name, Resume, time of employment

Investors

Link: Publicly traded company

Official location and Address

Link: <https://www.symantec.com/contact-us> (Symantec Corporation)

Country of residence: USA

Address: 350 Ellis Street, Mountain View, CA 94043, United States

Additional addresses: 45

Jurisdiction (country of registration)

Link: <https://www.symantec.com/privacy>

Country of jurisdiction: USA

Location Main offices

Location: 350 Ellis Street, Mountain View, CA 94043, United States

Ease of access to information

Transparency report: Not available

Board: Medium – Symantec webpage, “About Symantec”, “Management Team”

Management: Medium – Symantec webpage, “About Symantec”, “Management Team”

Investors: Not available

Official location and Address: Medium – Symantec webpage, “Contact Us

Jurisdiction: Easy – “Privacy Policy”

[London Trust Media – Private Internet Access](#)

Default webpage: <https://www.privateinternetaccess.com/>

[Transparency Report](#)

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

[Board of directors](#)

Link: Not available

Included: Not available

[Management](#)

Link: <https://www.privateinternetaccess.com/pages/team>

Included: Name, Job title

[Investors](#)

Link: Not available

[Official location and Address](#)

Link: <https://www.privateinternetaccess.com/helpdesk/kb/articles/where-are-you-located>

Country of residence: USA

Address: Not available

Additional addresses: Not available

[Jurisdiction \(country of registration\)](#)

Link: <https://www.privateinternetaccess.com/helpdesk/kb/articles/where-are-you-located>

Country of jurisdiction: USA

[Location Main offices](#)

Location: No confirmation from vendor

[Ease of access to information](#)

Transparency report: Not available

Board: Not available

Management: Easy – “Company, PIA Team”

Investors: Not available

Official location and Address: Easy – “support”, “FREQUENTLY ASKED QUESTIONS”, “Where are you located?”

Jurisdiction: Easy – “support”, “FREQUENTLY ASKED QUESTIONS”, “Where are you located?”

Pulse Secure – Pulse Connect Secure

Default webpage: <https://www.pulsesecure.net/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared:

Board of directors

Link: <https://www.pulsesecure.net/company/board-of-directors>

Included: Name, Resume

Management

Link: <https://www.pulsesecure.net/company/leadership>

Included: Name, Resume

Investors

Link: Not available

Official location and Address

Link: <https://www.pulsesecure.net/company/locations> (Pulse Secure LLC)

Country of residence: USA

Address: 2700 Zanker Road, Suite 200, San Jose, California 95134, United States of America

Additional addresses: 7

Jurisdiction (country of registration)

Link: <https://www.pulsesecure.net/support/eula/>

Country of jurisdiction: USA

Location Main offices

Location: No confirmation from vendor

Ease of access to information

Transparency report: Not available

Board: Easy – “ABOUT US”, “Board of Directors”

Management: Easy – “Leadership”

Investors: Not available

Official location and Address: Easy – “ABOUT US”, “Locations”

Jurisdiction: Easy – “SUPPORT”, “Support Home”, “EULA”

TunnelBear Inc (McAfee) – TunnelBear

Default webpage Tunnelbear: <https://www.tunnelbear.com/>

Default webpage McAfee: <https://www.mcafee.com>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

Board of directors

Link: Not available

Included: Not available

Management

Tunnelbear

Link: <https://www.tunnelbear.com/about>

Included: Name, Resume

McAfee

Link: <https://www.mcafee.com/enterprise/en-us/about.html>

Included: Name, Resume

Investors

Link: Not available

Official location and Address

Tunnelbear

Link: <https://www.tunnelbear.com/about> (TunnelBear Inc.)

Country of residence: Canada

Address: 310 Spadina Ave, Suite 200, Toronto, Ontario, M5T 2E7

Additional addresses: Not available

McAfee

Link: <https://www.mcafee.com> (McAfee, LLC.)

Country of residence: USA

Address: Corporate Headquarters, 2821 Mission College Blvd., Santa Clara, CA 95054 USA,

Additional addresses: Numerous

Jurisdiction (country of registration)

Tunnelbear

Link: <https://www.tunnelbear.com/about>

Country of jurisdiction: Canada

McAfee

Link: <https://www.mcafee.com/enterprise/en-us/about/legal/website-terms-of-service.html>

Country of jurisdiction: USA

Location Main offices

Location: No confirmation from vendor

Ease of access to information

Tunnelbear

Transparency report: Not available

Board: Not available

Management: Easy – “About Us”

Investors: Not available

Official location and Address: Easy – “About Us”

Jurisdiction: Easy – “About Us”

McAfee

Transparency report: Not available

Board: Not available

Management: Easy – “About Us”

Investors: Not available

Official location and Address: Easy – main page

Jurisdiction: Easy – “Legal Contracts & Terms”

KeepSolid – VPN Unlimited

Default webpage: <https://www.vpnunlimitedapp.com/>

Transparency Report

Link: Not available

Frequency: Not available

Date: Not available

Included: Not available

Data shared: Not available

Board of directors

Link: <https://www.KeepSolid.com/pressroom/board-of-members>

Included: Name, Resume

Management

Link: <https://www.KeepSolid.com/pressroom/management>

Included: Name, Resume

Investors

Link: No investors (confirmed by vendor)

Official location and Address

Link: <https://www.KeepSolid.com/> (KeepSolid Inc)

Country of residence: USA

Address: United States 3220 Arlington Ave. Suite 5A Bronx 10463

Additional addresses: Not available

Jurisdiction (country of registration)

Link: <https://www.vpnunlimitedapp.com/blog/addressing-criticism/>

Country of jurisdiction: USA

Location Main offices

Location: United States 3220 Arlington Ave. Suite 5A Bronx 10463, Ukraine, Odessa 2A Shevchenko Street 65044

Ease of access to information

Transparency report: Not available

Board: Easy – Keepsolid webpage, “Press Room”, “Board of Members”

Management: Easy – Keepsolid webpage, “Press Room”, “Management”

Investors: Not available

Official location and Address: Easy – Keepsolid webpage

Jurisdiction: Medium – “Blog”, “VPN Unlimited: Addressing Criticism and Learning from Lessons”

Summary

Table available data

Vendor	Product	Transparency Report (yearly updated)	Data shared according to Transparency report *	Board of Directors	Management
Avast	Avast SecureLine VPN	Yes	Yes	Yes	Yes
Avira	Avira Phantom VPN Pro	No	unknown	No	Yes
Cisco	AnyConnect Secure Mobility Client	Yes	Yes	Yes	Yes
ExpressVPN	ExpressVPN	No	unknown	No	No
F-Secure	F-Secure FREEDOME VPN	No	unknown	Yes	Yes
AnchorFree	Hotspot Shield Elite	Yes	No	Yes	Yes
NordVPN	NordVPN	No	unknown	No	No
Symantec	Norton WiFi Privacy	No	unknown	Yes	Yes
London Trust Media	Private Internet Access	No	unknown	No	Yes
Pulse Secure	Pulse Connect Secure	No	unknown	Yes	Yes
Tunnelbear Inc.	TunnelBear	No	unknown	No	Yes
McAfee	TunnelBear	No	unknown	No	Yes
KeepSolid	VPN Unlimited	No	unknown	Yes	Yes

* - This does not necessarily mean identifying information of customers has been shared.

Vendor	Product	Investors	Official Location and Address	Jurisdiction	Main Offices
Avast	Avast SecureLine VPN	No	Czech Republic	Czech Republic	Czech Republic
Avira	Avira Phantom VPN Pro	No	Germany	(Germany)	Germany
Cisco	AnyConnect Secure Mobility Client	No	USA	(USA)	NIP
ExpressVPN	ExpressVPN	No	British Virgin Islands	British Virgin Islands	NIP
F-Secure	F-Secure FREEDOME VPN	Yes	Finland	Finland	NIP
AnchorFree	Hotspot Shield Elite	Yes	USA	USA	USA
NordVPN	NordVPN	No	Panama	Panama	NIP

Symantec	Norton WiFi Privacy	No	USA	USA	USA
London Trust Media	Private Internet Access	No	USA	USA	NIP
Pulse Secure	Pulse Connect Secure	No	USA	USA	NIP
Tunnelbear Inc.	TunnelBear	No	Canada	Canada	NIP
McAfee	TunnelBear	No	USA	USA	NIP
KeepSolid	VPN Unlimited	No	USA	USA	USA, Ukraine

(USA), (Germany) – Assumed jurisdiction due to official address, no specific information available
 NIP – No confirmation from vendor about main offices

Table ease of access to data

Vendor	Product	Transparency Report	Board of Directors	Management
Avast	Avast SecureLine VPN	Easy	Easy	Easy
Avira	Avira Phantom VPN Pro	Not available	Not available	Easy
Cisco	AnyConnect Secure Mobility Client	Easy	Easy	Easy
ExpressVPN	ExpressVPN	Not available	Not available	Not available
F-Secure	F-Secure FREEDOME VPN	Not available	Easy	Easy
AnchorFree	Hotspot Shield Elite	Easy	Easy	Easy
NordVPN	NordVPN	Not available	Not available	Not available
Symantec	Norton WiFi Privacy	Not available	Medium	Medium
London Trust Media	Private Internet Access	Not available	Not available	Easy
Pulse Secure	Pulse Connect Secure	Not available	Easy	Easy
Tunnelbear Inc.	TunnelBear	Not available	Not available	Easy
McAfee	TunnelBear	Not available	Not available	Easy
KeepSolid	VPN Unlimited	Not available	Easy	Easy

Vendor	Product	Investors	Official Location and Address	Jurisdiction
Avast	Avast SecureLine VPN	Not available, Public company	Easy	Easy
Avira	Avira Phantom VPN Pro	Not available	Easy	not specifically provided
Cisco	AnyConnect Secure Mobility Client	Not available, Public company	Easy	not specifically provided
ExpressVPN	ExpressVPN	Not available	Easy	Easy
F-Secure	F-Secure FREEDOME VPN	Not available, Public company	Easy	Medium
AnchorFree	Hotspot Shield Elite	Easy	Medium	Easy
NordVPN	NordVPN	Not available	Easy	Easy
Symantec	Norton WiFi Privacy	Not available, Public company	Medium	Easy
London Trust Media	Private Internet Access	Not available	Easy	Easy
Pulse Secure	Pulse Connect Secure	Not available	Easy	Easy
Tunnelbear Inc.	TunnelBear	Not available	Easy	Easy
McAfee	TunnelBear	Not available	Easy	Easy
KeepSolid	VPN Unlimited	Not available	Easy	Easy

When looking at the transparency regarding requests for data only three companies currently publishing such full-scale report: AnchorFree, Avast and Cisco. NordVPN has something resembling a transparency report, but it is only three lines in the “about” section and doesn’t fulfil several aspects expected from a full fledged transparency report. F-Secure informed us upon information request that they are considering publishing one from 2019 onwards. Of the three products publishing the report, only AnchorFree claims to have not released any data on its users. Avira informed us that because they have a no log-policy in place, there is no data to be shared and that is why no transparency report is included (appendix).

A company’s leadership, public face and corporate trust are reflected in the Board of Directors, Management and Investors.

Not all companies have a board of directors or investors. Avira informed us that as a German GmbH they don’t have this sort of entity. Of the remaining 12 products, half state the board on their webpage and it is easy to find in most cases. The information was provided by Avast, Cisco, F-Secure, AnchorFree, Symantec, Pulse Secure and KeepSolid.

Every company has some sort of Management team. These are the people steering and supervising the proceedings of the company on a day to day bases. All but two companies provide details on this. ExpressVPN and NordVPN were the only two vendors not disclosing the information. Again, for the most part, the information was easy to come by.

Only two companies provide insight into investors: F-Secure and AnchorFree. The information is easy to find. KeepSolid informed us that they do not have any investors to declare on their page.

The official location doesn't just receive all mail but defines the company's official jurisdiction. The majority of companies naturally have their jurisdiction in the same country as their official location. We could not find any information on this for Avira and Cisco but assume the same. We are a bit sceptical if the official location also represents the location of the main offices. Avast, Avira, AnchorFree and KeepSolid confirmed this for their products. This is important as law enforcement entities may seize servers and question staff in a country different from the company's official jurisdiction so user rights are not necessarily protected by the official company's jurisdiction.

As for ease of finding the wanted information, most were easy enough to obtain.

Symantec's Norton WiFi Privacy takes more steps to get to the desired information. Finding details on the Board of Directors, Management team and Official location requires us to go to the Symantec webpage instead and find the information on the product page.

F-Secure Jurisdiction is a bit tricky to find. It requires to visit the "Terms of Service" on the bottom of the page and then again on "Terms of Services" on the top of the page which is not where and how one would be looking for these details.

Conclusion

In conclusion, we can say there is a very different approach to the openness of vendors in regards to company information. This may be due to several reasons like lack of awareness for the need, the information is there but hard to find. It might mean nothing or it might mean that the user should indeed be careful trusting the company. This is something we cannot say with any certainty. All vendors disclose their official location and therefore their jurisdiction.

AnchorFree (Hotspot Shield) has all the information we require freely available and easy to access. There is no doubt about who manages the company, who sits on the board, where the company is situated not just legally but also physically. Also, it is one of the few companies publishing a transparency report and was the only one not disclosing any information to law enforcement according to that report. The only thing missing is the office location on the webpage of the product but it can be found on the company webpage.

Avast and Cisco, both two big names in the IT industry also provide the majority of information we would expect to find including the transparency report. We have to make a mention of the fact that according to their transparency report there was some data shared with law enforcement agencies. However, this does by no means mean there is any identifying information included. According to both companies, there is a no-logging policy in place so the shared data should be irrelevant metadata of some sorts. We would have to criticize that we did not find any information about existing investors, only information for investors, so we would assume that there are some or even many. Avast also responded to our request for comment, unfortunately, they have not in time of the release of this report responded to further enquiries regarding their investors.

F-Secure discloses the Board of Directors, the Management Team as well as providing a very comprehensive and clear list of its Investors. They also informed us when responding to our request for comment about the idea of possibly publishing a transparency report in 2019. They have not yet at the time of the release of this report responded to our request for information about the location of their main offices.

KeepSolid, Pulse Secure and Symantec all disclose their board of directors and the management team. KeepSolid and Symantec also responded to our request for comment and informed us that their main offices are indeed in the area of jurisdiction as well as KeepSolid having another main office in the Ukraine.

For reviewing the information on Symantec's Norton WiFi Privacy we have to look at the Symantec webpage directly. Which does make sense from a corporate point of view, bundling this information centrally but makes it more troublesome for Norton Wifi Security users instead of having access to the information on the product webpage.

Avira, London Trust Media, Tunnelbear Inc. and McAfee provide us with an overview of their Management Team. Avira also informed us that their main offices are at the official office address.

ExpressVPN and NordVPN are not disclosing anything but their postal address. For NordVPN it was also not trivial to find out that they are an entity of Tefinkom co S.A. . NordVPN does have something resembling a transparency report but unfortunately doesn't fulfil the usual standards in the IT industry.

Appendix

Vendor Response

Five vendors have responded to our request for comments and their details have either been used to update the content of the report and marked as such or been included below.

The companies are AnchorFree, Avast, Avira, KeepSolid, Symantec

Avira

Transparency Report

We have a strict no-logs policy available at <https://www.avira.com/en/support-for-home-knowledgebase-detail/kbid/1890?navsrc=pp>

As a result, we have no information about our users' online activities when using our VPN service.

We do not publish a formal transparency report. Given our strict no-logs policy, we have not disclosed any information about users of our VPN service following a search warrant, subpoena or similar request. As a member of the TeletrusT initiative "IT Security made in Germany" we also have committed to the following standards for our software solutions:

- The company is headquartered in Germany.
- The company offers trustworthy IT security solutions.
- No solutions that contain non-declared backdoors are offered.
- All the company's IT security research and development are conducted in Germany.
- The company is compliant with German data protection law

Board of Directors

We are established under German law as a GmbH & Co KG. This type of entity does not have a board of directors.

Keepsolid

Investors

Link: we do not have investors