
INTERNATIONAL FELLOWSHIP OF CHRISTIANS AND JEWS OF CANADA

PRIVACY POLICY

Approved by the Board of Directors June 10, 2020.

A. INTRODUCTION

About International Fellowship of Christians and Jews of Canada

International Fellowship of Christians and Jews of Canada (“IFCJ Canada”) is a Canadian charitable corporation with the following charitable purposes:

1. To advance, encourage and support Christians and Jews in the expression and practice of their respective faiths by facilitating and furthering an understanding and application of biblical doctrine and values in accordance with the Statement of Beliefs set out herein,
2. Provided that these charitable purposes shall include only those which are, at law, exclusively charitable and without limiting the generality of the foregoing, and to accomplish the aforesaid purposes:
 - (a) to uphold and promote the Statement of Beliefs herein;
 - (b) to conduct, undertake and support religious programs, services and meetings to further an exchange of religious instructions, teachings and ideas between Christians and Jews and an understanding of their common religious values and heritage;
 - (c) to develop, support, encourage and co-ordinate the dissemination and implementation of Judeo-Christian teachings and values in accordance with the Statement of Beliefs herein;
 - (d) to assist Jews to immigrate to and settle in the state of Israel as a means of addressing the suffering and persecution undergone by Jewish people;
 - (e) to further and support the fulfillment of Biblical teachings through projects and initiatives designed to relieve human suffering and economic hardships for those in need as testimony of God’s word and promise;
 - (f) to facilitate the advancement and practice of the Jewish and Christian Faiths by fostering an environment devoid of religious persecution and discrimination by developing, supporting, encouraging and coordinating programs, projects and initiatives to advance religious tolerance and freedom between Christians, Jews and other religious faiths;
 - (g) to develop, establish, operate and maintain centers, retreat centers, conference centers, and related facilities to provide instructions, seminars, classes, meetings and conferences in an environment conducive for fellowship between Christians and Jews and members of other religious faiths in accordance with the purposes herein.

What is Personal Information?

"Personal Information" means information about an identifiable individual, including any information about you or that can be used to identify you. For the purposes of this Privacy Policy, Personal Information means any information provided to or collected by IFCJ Canada about an identifiable individual.

Your Privacy

Your privacy is very important to us. We take your privacy seriously and are committed to protecting your Personal Information.

Purpose of this Privacy Policy

The purpose of this Privacy Policy is to give you information on what Personal Information IFCJ Canada collects from you, why we collect it and how we use it, as well as what happens if you choose not to disclose certain Personal Information to us.

Scope of this Privacy Policy

This Privacy Policy applies to any Personal Information provided to or collected by IFCJ Canada through our website (the "Website"), by email, facsimile, postal mail, hand delivered, verbally or any other means.

Please read this document carefully.

B. THE TEN PRIVACY PRINCIPLES

Whenever we collect, use or disclose your Personal Information, we will comply with the Ten Principles for the Protection of Personal Information, set out in Schedule 1 of Canada's *Personal Information Protection and Electronic Documents Act*.

The Ten Principles are:

1. Accountability:

IFCJ Canada is responsible for Personal Information under its control and we will designate an individual to be accountable for our compliance with these principles.

2. Identifying Purposes:

IFCJ Canada will identify the purposes for which Personal Information is collected at or before the time the information is collected.

3. Consent:

The knowledge and consent of the individual are required for the collection, use, or disclosure of Personal Information, except in certain circumstances required or permitted by law.

4. Limiting Collection:

We will limit our collection of Personal Information to that which is necessary for the purposes identified by IFCJ Canada. Information will be collected by fair and lawful means.

5. Limiting Use, Disclosure and Retention:

We will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. We will retain Personal Information only as long as necessary for the fulfillment of those purposes.

6. Accuracy:

We will take reasonable steps to keep Personal Information as accurate, complete and up to date as is necessary for the purpose for which it is used.

7. Safeguards:

We will take reasonable steps to keep Personal Information protected by security safeguards appropriate to the sensitivity of the information.

8. Openness:

IFCJ Canada will make easily available to individuals specific information about our policies and practices relating to the management of Personal Information.

9. Individual Access:

Upon request, we will inform an individual of the existence, use, and disclosure of his or her Personal Information, and give them access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it corrected as appropriate.

10. Challenging Compliance:

An individual will be able to address a challenge about our compliance with these principles to the designated individual(s) accountable for IFCJ Canada's privacy compliance.

C. HOW IFCJ CANADA COLLECTS PERSONAL INFORMATION

IFCJ Canada collects Personal Information in different ways, including:

- Direct interactions – you may voluntarily provide us with Personal Information by filling out forms; creating an account on our Website; making a donation to IFCJ Canada; applying to work or volunteer for IFCJ Canada; registering to attend an event, conference, workshop, seminar or class; participating in one of our religious programs, services or meetings; requesting information to be sent to you; subscribing for our publications; responding to one of our direct mail or telemarketing campaigns; filling out one of our online surveys; or when you communicate with us face to face, over the telephone, by mail, by email, by text, through social media or through other means.
- Automated interactions – when you use our Website, we may automatically collect technical data about your equipment and browsing history using cookies and similar technologies (See D below for more information).
- Third party interactions – we may collect Personal Information when you interact with our content on third-party sites or platforms, such as Facebook, Instagram or YouTube. This may include data such as comments or feedback, "likes" or shares, profile data or the fact that you viewed or interacted with our content. Our American affiliate ("IFJC US") may redirect your Personal Information to us if you have inadvertently provided it to IFCJ US via its website or call centre. We may also acquire Personal Information by renting mailing lists of prospective donors from other organizations.

D. WHAT PERSONAL INFORMATION IS COLLECTED BY IFCJ CANADA

The Personal Information we may collect could include:

- Personal identifiers such as your name, date of birth and gender.
- Contact information such as your mailing address, telephone number and email address.
- Information about your religion, ministry interests and motivations for support.
- Credit card and bank account information, if you make donations or purchase goods or services from us. We collect this information via secure payment processing services.
- Donor information such as your donation history.
- Employment history and background checks for volunteers and employees, including results of police records checks.
- Employee records.

- Website account information such as your log-in, user name, password information and other security information.
- Event information.
- Images, including photographs and videos.
- Your Website profile including all photos, posts, videos and other content.
- Information about your device such as your IP address, location or provider and your usage information and browsing history. (See E below for more information).
- Information about your interactions with our content on third-party sites or platforms, such as Facebook and Instagram.
- Communications such as letters, emails and digital communications that we send to you or that you send to us.

E. INFORMATION COLLECTED THROUGH COOKIES AND SIMILAR TECHNOLOGIES

A cookie is a small text file that is placed on your device when you visit a website and can last either for the duration of your visit (a “session cookie”) or for repeat visits (a “persistent cookie”). When you visit our Website, we may automatically collect information about you using cookies and other similar mechanisms that work in the same way. We use the word “cookie” in this policy to refer to all files that collect information in this way.

Some of the cookies we use are necessary to enable you to use our Website. Other cookies may not be essential but may make it easier for you to use the Website (such as by remembering you when you return to the Website). Some cookies are used for advertising or tracking purposes.

We use cookies for the following purposes:

- to identify you when you visit and navigate the Website (authentication)
- to determine if you are logged into the Website (status)
- to store information about your preferences and to personalize the Website for you (personalization)
- as a security measure, to prevent fraud and to protect the Website (security)
- to help us analyze the use and performance of our Website (analysis)
- to allow Google and our other advertising partners to track and analyze your behaviour on our Website and across the internet (tracking)

- to publish interest-based advertisements on our Website that are tailored to reflect your interests (advertising).

We collect the following types of information through cookies:

- your IP address
- your approximate geographic location
- the type of operating system you are using (eg Windows or Mac)
- the type of device you are using
- the type of browser you are using
- your domain name
- which pages you visit on our Website and how frequently
- the date and time of those requests.

We collect this information to better understand how visitors use our Website, to improve the content of the Website and to improve your interaction with the Website by making it easier for you to get back to the pages you have looked at the next time you visit.

You have choices when it comes to cookies. All major browsers allow you to disable cookies. If you do not want information collected through the use of cookies, you can disable cookies by changing the setting of your Internet browser. If you disable cookies, you may be unable to access some features on our Website.

The Website may also provide links to third-party websites. Clicking on those links may allow third parties to collect or share information about you. We cannot control these third-party websites and we are not responsible for the actions or policies of such third parties. You should check the privacy policies of third parties when visiting their websites or when providing any Personal Information to them.

F. USING YOUR PERSONAL INFORMATION

We use the Personal Information we collect to manage our operations and for various purposes associated with the programs and services we provide. We collect, use, and disclose Personal Information only for purposes that a reasonable person would consider appropriate in the circumstances.

The main purposes for which we generally use Personal Information are:

- To manage, oversee and administer our operations, programs, services, events and activities

- To organize, promote and provide conferences, workshops, seminars, classes, religious programs and other events that advance the charitable purposes of IFCJ Canada
- To raise awareness of our programs, services, events and activities
- To monitor the quality of our programs and services and to better understand the needs of our donors, supporters and other stakeholders so that we can improve our programs and services
- To assist in the development of new programs, services, events and activities
- To retain and contract with third-party vendors and providers whose services we require in order to achieve our charitable purposes
- For research, data analysis and data management, both internally and using third-party providers, to optimize our performance and sustainability so that we can achieve our charitable purposes
- To maintain and manage relationships
- To carry out fundraising activities to meet the needs of IFCJ Canada
- To allow individuals to make a donation to IFCJ Canada or to purchase goods or services from IFCJ Canada
- To process and acknowledge donations
- To provide donors and supporters with stewardship and recognition information
- To provide donors, potential supporters and other stakeholders with information about IFCJ Canada initiatives
- To determine your solicitation preferences
- To provide, administer and protect our Website including troubleshooting, data analysis, maintenance and network security
- To deliver relevant Website content and to provide associated functionality such as technical support and password reminders
- To establish, manage or terminate our relationships with our employees, volunteers, consultants and contractors
- To perform or carry out the terms of any contract between us
- To respond to your inquiries

- To respond to requests for services and information
- To send you informational or promotional communications (in compliance with *Canada's Anti-Spam Legislation*)
- To record whether you have subscribed to or unsubscribed from any of our mailing lists or publications
- To disclose or share your Personal Information when required to comply with legal or regulatory requirements
- To prevent and detect fraud and other crimes such as terrorism financing or money laundering
- To protect our rights, property or safety or that of our employees, volunteers, contractors, consultants or any other person
- For other purposes that we have told you about and for which you have given us your consent
- To fulfill other purposes permitted or required by law.

We do not collect more Personal Information than we need to achieve these purposes.

If IFCJ Canada has already collected your Personal Information, we will not use that Personal Information for a new purpose without advising you first in writing and obtaining your consent for the new use, unless we are permitted by law to do so.

G. WHO WILL YOUR PERSONAL INFORMATION BE SHARED WITH

We may have to share Personal Information with the parties set out below for the following purposes:

- With IFCJ US, for the purposes of redirecting donor information that was mistakenly provided to us by IFCJ US donors, inviting IFCJ Canada donors to events being held by IFCJ US, carrying out special gifts mailings to donors and managing relations with donors who give to both IFCJ Canada and IFCJ US
- Service providers, such as those who provide us with IT and system administration services, research and data analysis services, fundraising services, telemarketing services, direct mail services, donor relations services, donation management services, database management services and after hours calls management services
- Professional advisors, such as lawyers, auditors, bankers and insurers who provide us with legal, accounting, auditing, banking and insurance services
- Government, regulatory authorities, law enforcement, dispute resolution bodies, courts and similar entities to comply with any legal or regulatory obligation, to detect and prevent crimes or to assert or defend legal rights and interests

- Any persons or entities where we have a legitimate business reason for doing so, such as to manage risk, to process payments to you or to someone on your behalf or to perform or carry out the terms of any contract between us
- If we sell or dispose of all or substantially all of our assets or operations
- To anyone we reasonably believe is your agent
- To other third parties if we have told you about them and you have given us your consent.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements. We require all third-party service providers to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions.

Although IFCJ Canada is located in Canada and operates programs and activities in Canada, some or all of the Personal Information we collect may be transferred to third-party service providers in the course of our normal operations or activities including, without limitation, being stored on servers located outside of Canada in cloud-based environments or transferred through other technological measures to trusted third parties such as IFCJ US to assist us in serving you. Some of our service providers are located outside of Canada and therefore Personal Information may be stored or processed in jurisdictions outside of Canada, including the United States. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions, including, without limitation, the USA *Patriot Act*.

H. PROTECTING THE PRIVACY OF CHILDREN AND YOUTH

We understand that Personal Information relating to children and youth is particularly sensitive, especially the younger they are. Consistent with the position of the Office of the Privacy Commissioner of Canada, we will not knowingly collect Personal Information from children under the age of 13 unless we have the consent of their parents or guardians.

We collect the minimum amount of Personal Information of children and youth necessary to achieve our purposes.

If you are a child or youth, you should review this Privacy Policy with your parents or guardians to make sure that you understand and consent to everything in it. If you are under the age of 13, you should not access our Website or provide us with any Personal Information unless your parent or guardian has consented. If we discover that we have collected Personal Information from a child under the age of 13 without parental consent, we will delete that Personal Information.

I. CONSENT FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

We only collect, use and disclose Personal Information with the consent of the individual. Your knowledge and consent are required for us to collect, use or disclose your Personal Information, except in certain limited circumstances such as to investigate a crime or to comply with a court order. We are committed to obtaining meaningful consent. We use clear explanations and plain language to make sure that our consent processes are understandable and user friendly.

If we want to collect your Personal Information for a purpose that is not identified in this Privacy Policy, or if we want to use your Personal Information for a different purpose than the one we originally collected it for, we will tell you about the new purpose and will get your consent before we use your Personal Information for the new purpose.

Consent can be either express or implied.

Express consent means that a person has clearly and explicitly agreed to the collection, use or disclosure of their Personal Information. Express consent may be given in a number of ways:

1. Verbally – such as when you tell us that you consent over the telephone or in a face-to-face meeting.
2. In writing – such as when you fill out a survey form that tells you how your Personal Information will be collected, used and disclosed and asks for your consent. By completing and signing the form, you are providing your consent.
3. Through electronic means – such as when you check off a box on a website that says that you agree to the collection, use and disclosure of your Personal Information as described on that website.

Implied consent means a situation in which, even though a person has not given express written or verbal consent, we assume that they have consented to the collection, use or disclosure of their Personal Information based on what they do or do not do. For example, if you give someone a document that contains your Personal Information, that person can reasonably conclude that you consent to their collection of this Personal Information.

In determining whether to obtain express consent or implied consent, IFCJ Canada takes into account the sensitivity of the Personal Information and the reasonable expectations of the individual.

IFCJ Canada collects sensitive or potentially sensitive information such as:

- Personal identifiers such as your name and date of birth.
- Contact information such as your mailing address, telephone number and email address.
- Financial information such as your credit card or bank account information.

- Information about your religious affiliation.
- Images such as photographs and videos.
- Information about your employment history, record of service in your community and police record.

IFCJ Canada requests express consent in most circumstances and always when sensitive or potentially sensitive Personal Information is collected.

IFCJ Canada relies on implied consent only in very limited circumstances, such as to complete a process that has already been started.

You do not have to consent. You have the right to withhold your consent. You should be aware that in many cases, our collection, use, or disclosure of Personal Information is a valid condition of service, which means that we need that Personal Information in order to provide a particular service, such as sending one of our publications to you or enrolling you in a program. In such cases, if you do not wish to consent to the collection, use or disclosure of your Personal Information, we may not be able to do certain things, such as enroll you in the program or send the publication to you.

You have the right at any time to withdraw or cancel your consent to the collection, use or disclosure of your Personal Information by contacting the Privacy Officer, Jackie Gotwalt, Interim Executive Director and Privacy Officer at privacy@ifcj.ca, telephone (416) 596-9307, or at our mailing address 330 Bay St, Suite 1505, Toronto, Ontario, M5H 2S8. Please be aware that withdrawals of consent only take effect from the date of cancellation. They cannot be retroactive. We will let you know if your withdrawal could have any consequences, such as IFCJ Canada being unable to provide you with goods or services.

J. LIMITING COLLECTION OF PERSONAL INFORMATION

IFCJ Canada will only collect personal information for the purposes identified in this Policy. If we want to collect information for a different purpose, we will tell you what that purpose is in writing and obtain your consent. We collect Personal Information by fair and lawful means.

We will not collect, use or disclose more Personal Information than is reasonably necessary to meet the identified purposes.

K. LIMITING USE, DISCLOSURE, AND RETENTION OF PERSONAL INFORMATION

IFCJ Canada will only use or disclose Personal Information for the purposes that it was collected for, unless we have your consent to use it for a different purpose or if we are required by law.

We have safeguards in place to prevent Personal Information from being disclosed or shared more widely than is necessary to achieve the purpose.

If we want to use or disclose your Personal Information for a new purpose, we will advise you of this purpose in writing and get your consent.

We keep Personal Information only as long as necessary to achieve those purposes although we may retain certain Personal Information indefinitely if we are required to do so by Canada Revenue Agency or by our insurers.

If you have made a request to access Personal Information, we will keep that Personal Information for as long as is necessary to allow you to fully seek any remedies (exhaust any recourse) that you may have under federal and provincial legislation across Canada.

We may store your Personal Information in cloud-based environments or through other technological measures operated by trusted third parties.

IFCJ Canada does not sell, rent or trade its mailing lists or other Personal Information. IFCJ Canada may acquire Personal Information by renting mailing lists of prospective donors from other organizations. We require all organizations that rent mailing lists to us to enter into contractual agreements with us that confirm that all mailing lists have been prepared and rented to us in compliance with PIPEDA including, without limitation, confirming that all individuals on the list have consented to being included as prospective donors on a mailing list that will be rented to other organizations. If you advise us that you withdraw your consent to appearing on a mailing list that we have rented, we will cease sending you further communications.

L. ENSURING ACCURACY OF PERSONAL INFORMATION

IFCJ Canada makes decisions on the basis of Personal Information that is as accurate and complete as possible.

IFCJ Canada has adequate processes and safeguards in place to keep Personal Information as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used, so that we can minimize the possibility that inappropriate information is used to make a decision about a person.

We will not routinely update Personal Information, unless such a process is necessary to fulfil the purposes for which the Personal Information was collected.

M. PROTECTION OF PERSONAL INFORMATION

IFCJ Canada is committed to protecting your Personal Information by security safeguards appropriate to the sensitivity of the information.

We take all reasonable precautions to protect Personal Information in both paper and electronic format against loss, theft, snooping, hacking or people collecting, disclosing, copying, using or changing it without authorization.

We use a higher level of protection to safeguard more sensitive Personal Information. Our methods of protection include:

- Physical measures – such as areas of restricted access and locked filing cabinets.
- Organizational measures – such as security policies and procedures, employee training on privacy issues, security clearances and limiting access on a "need-to-know" basis.
- Technological measures – such as passwords, encryption, audits as well as strong data security software and systems to protect the Personal Information in IFCJ Canada's custody from hackers and malicious intruders.

IFCJ Canada makes all employees, volunteers as well as third-party providers aware of the importance of maintaining the privacy and security of Personal Information. All IFCJ Canada employees and volunteers must sign a confidentiality agreement. We require all third parties to enter into contractual agreements with us that require them to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements.

We securely destroy Personal information so that reconstruction is not reasonably possible. This prevents unauthorized parties from gaining access to the Personal Information.

Our security practices and technology measures do not guarantee absolute security of Personal Information. You can reduce risk to your own Personal Information by using strong passwords, keeping your passwords confidential and following other Personal Information security best practices.

N. OPENNESS, ACCOUNTABILITY AND CHALLENGING COMPLIANCE

We have appointed a Privacy Officer to oversee questions relating to privacy and this Privacy Policy.

If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the Privacy Officer at:

Jackie Gotwalt
Interim Executive Director
Privacy Officer
International Fellowship of Christians and Jews of Canada
330 Bay St, Suite 1505
Toronto, ON
M5H 2S8
Tel: 416-596-9307
Fax: 416-981-7293
email: privacy@ifcj.ca.

We also make this Privacy Policy and other privacy policies and practices easily available by posting them on this Website.

If you have any complaints about our privacy practices or procedures, please contact the Privacy Officer.

O. ACCESS TO PERSONAL INFORMATION AND CORRECTION OF PERSONAL INFORMATION

If you make a request to the Privacy Officer, we will inform you of the existence, use, and disclosure of your Personal Information and you will be given access to that Personal Information.

You can challenge the accuracy and completeness of the Personal Information and have it changed or corrected as appropriate if there is an error or omission.

These requests may be made by contacting the Privacy Officer.

If you need assistance in preparing your request, we will assist you.

The procedures and time frame we will follow in processing these requests is as follows:

- We will respond to your request within 30 days. If we cannot do so, we will send you a notice of extension, giving us additional time to respond to your request.
- We will tell you how your Personal Information is being used or has been used and will tell you the third parties to which it has been disclosed. When it is not possible to provide a list of the third parties to which we have actually disclosed your personal information, we will provide a list of organizations to which we may have disclosed your Personal Information.
- We may need you to provide more information to permit us to verify your identity before we can process your request.
- We will respond to your written request at no or minimal cost to you. If there is a cost involved for the copying, transcribing or transmitting your Personal Information, we will inform you of the approximate cost beforehand and will only proceed if you have advised us to go ahead.
- We will provide the Personal Information in a form that you can understand. For example, if we use abbreviations or codes to record information, we will provide you with an explanation of such abbreviations or codes.
- In certain situations, we may not be able to provide access to all the Personal Information we have about you, or inform you of all disclosures of your Personal Information. For example, if there are references to other people or if there are legal or security reasons. If we can delete the information that cannot be shared with you, we will do so and provide you with access to the remaining information.
- Unless prohibited by law, the reasons for denying access and the statutory provision on which the refusal is based, if any, will be provided to you in writing.
- If you can demonstrate to our satisfaction that your Personal Information is not correct or complete for its purposes, we will correct the information as required and issue a new copy with the changes. If appropriate, we will add a statement that Personal Information has been deleted. If

appropriate, we will send the corrected Personal Information to any third parties who had access to the inaccurate or incomplete Personal Information.

- If you have challenged the accuracy or completeness of your Personal Information but we have not resolved the issue, we will keep a record of your challenge in your file and, if appropriate, we will tell third parties who have had access to your Personal Information about the unresolved challenge.

P. COMPLIANCE WITH CANADA’S ANTI-SPAM LEGISLATION

IFCJ Canada complies with the requirements of Canada’s Anti-Spam Legislation, as amended from time to time at all times, including when: sending emails or texts from an IFCJ Canada account, email address or domain name, obtaining consent from recipients to send emails or texts, managing and responding to requests to unsubscribe and documenting and retaining records of consent. IFCJ Canada does not send commercial electronic messages (“CEMs”) to any person unless it has express or implied consent from the recipient, the CEM includes identification and contact information for the sender and the CEM has an unsubscribe mechanism. Complaints regarding the sending of CEMs and requests to unsubscribe from CEMs should be directed to the Privacy Officer at privacy@ifcj.ca.

Q. OTHER JURISDICTIONS

IFCJ Canada operates within, is subject to and complies with Canadian privacy law.

IFCJ Canada is not established in the European Union (“EU”), does not offer goods and services to individuals in the EU and does not knowingly monitor the behaviour of individuals in the EU. IFCJ Canada does not knowingly collect or process Personal Information from individuals located in the EU. Individuals located in the EU should not access our Website or provide us with any Personal Information. If you have any questions or concerns about our privacy practices or procedures in relation to other jurisdictions, please contact the Privacy Officer at privacy@ifcj.ca.

R. CHANGES TO PRIVACY POLICY

We may make changes to this Privacy Policy from time to time, such as in response to developments and changes in privacy law. When we post changes to this Privacy Policy on our Website, we will change the “last updated” date at the top of this Privacy Policy. If possible, we will post notices of significant changes before they take place. We will not reduce your rights under this Privacy Policy without your consent. Your continued use of this Website after any changes are made signifies your agreement with the terms of the revised Privacy Policy.