

FamilyTreeDNA Privacy Statement

At FamilyTreeDNA, user privacy is an extremely high priority for us and something we have taken seriously for over 18 years. At FamilyTreeDNA, we handle your Personal Information with great care and implement safeguards to protect your data.

It is our goal to be transparent about the Personal Information you provide, including your DNA Data, as well as give you the control over how it is utilized, shared, and stored.

1. Introduction

Our Privacy Statement was created to help you better understand how we collect, use, store, process, share, and transfer your Information when operating our website, software, products, and other services (collectively the "Services"). This Privacy Statement outlines our practices and the controls we give you to manage your privacy within our Services and describes the privacy practices of the FamilyTreeDNA websites that link to this Statement.

2. Consent

Account creation requires that you purchase a DNA test or upload your Genetic Information. To create an account and access our Services, you must agree to the FamilyTreeDNA [Terms of Service](#) and this Privacy Statement by clicking "Accept Terms & Complete Purchase" on the checkout page.

By clicking "Accept Terms & Complete Purchase," you are telling us that you consent to FamilyTreeDNA collecting, processing, and sharing your Personal Information as described in this Privacy Statement and any other documents referenced in this Privacy Statement. If you are signing in to your account for the first time as a result of someone purchasing the kit on your behalf, you are agreeing to this Privacy Statement and our Terms of Service by use of the Service.

At any time, you can request that FamilyTreeDNA remove information you have uploaded into your account, such as your Genetic Information or a family tree. Please see Section 7 "Your options" for specific details about deleting your data.

3. The types of Information FamilyTreeDNA collects

1. Information you provided directly to us and information related to our genetic testing services:

1. **Personal Information:** Information that can help identify you. FamilyTreeDNA collects and stores the following types of personal information to provide you the Services:

1. **Account Information:** Information you provided about yourself when purchasing/and or registering our Services. This

includes name, email, phone number, kit ID and password, billing and shipping address, and payment information.

2. **Genetic Information:** Readable DNA Data. After receiving your cheek swab in the return envelope included in your kit, we extract your DNA from your cheek swab in our in-house laboratory. From here, we convert your DNA into readable DNA Data.
 3. **A note about your DNA sample:** Once our laboratory has produced your DNA Data, the samples are stored so that they can be attainable for future testing. Future testing may be done if you consent to future testing of your sample or if you otherwise agree to our Informed Consent for Research.
 4. **Profile Information:** We gather the information you use to create a user profile. Depending on your share settings, this information may be seen by other FamilyTreeDNA users. This can include your sex, profile image, name, location, etc.
 5. **User Provided Content:** All information you present about yourself or other individuals, living or deceased, when you voluntarily participate in the Services, Group Projects, or Forums. For example, User Provided Content includes any post or message you place on FamilyTreeDNA community forums.
 6. **Self-Reported Information:** Information about yourself that you submit into forms, surveys, or features while signed in to your FamilyTreeDNA account. For example, family history information or ethnicity.
 7. **Website Behavior Information:** Information on how you use the FamilyTreeDNA website obtained through cookies, log files, and web beacon technology. This may include information like browser type, domains, and page views.
 8. **Additional User Information:** All information given to us when you answer online questionnaires or email surveys provided through the Services.
2. **Communications with Customer Service:** When you contact our Customer Service center or correspond with us about our Service, we collect information to: track and respond to your query, investigate any breach of our policies or regulations, and analyze and improve our Services.
 3. **Aggregate Information:** Information that has been combined with that of other users and analyzed or assessed as a whole, such that no specific individual may be reasonably identified.
 4. **Pseudonymous Information:** Information that has been stripped of your Account Information and other identifying data, such that you cannot easily be identified as an individual to the public, and is instead only identifiable by a kit number or other alphanumeric sequences.
2. **Information FamilyTreeDNA collects through the use of the Services via tracking technology:**
 1. **Web Behavior Information:** Information on how you use the FamilyTreeDNA website obtained through cookies, log files, and web beacon technology. We, as well as our third-party partners, use cookies and other technologies to help us identify you, personalize the Services

and our offers to you, determine the success of marketing campaigns, provide security, evaluate Service usage, collect demographic information about users, and to deliver targeted advertising on our site and on other sites.

2. **Computer and Mobile Device Information:** We receive certain information and store it in log files. This may include how you access our Services, including the website you visited before landing on FamilyTreeDNA, your exit page, your Internet protocol (IP) address, your web browser, your computer operating system, your Internet Service Provider (ISP) or the mobile device you use to access the Internet. This log information may be combined with other information we collect about you, such as your kit number or invoice number. We do this to better the services we offer you, and to improve marketing, analytics, and site functionality.
3. You may adjust your settings as described in our Cookie Policy if you do not want us to use data about your interests or behaviors to serve you targeted ads. For information on “Do Not Track,” please see our [Cookie Policy](#).
4. Third parties that we partner with to display advertising based upon your Web browsing activity or that we use to allow particular features on our site use Flash Cookies to gather and store information.
5. Please see Section 5.G., below, to learn more about our third-party advertising partners.
6. **Google Analytics:** Google Analytics is used to perform many of the tasks listed above.
7. **Other Types of Information:** We are always working to strengthen our Services with new products, features, and applications that may result in the acquisition of new types of information. We will update our Privacy Statement as needed.

4. How does FamilyTreeDNA use your information

FamilyTreeDNA will use and share your personal information with third parties in the ways that are described in this Privacy Statement.

1. **FamilyTreeDNA uses your Personal Information to provide, personalize, analyze, and improve our Services:** These acts may include, in addition to other things not specifically mentioned, using your information in a manner consistent with other commitments in this Privacy Statement to:
 1. Open an account, processing payments for FamilyTreeDNA services and test kits, and communicate with you about the Services;
 2. Process and deliver your genetic testing results;
 3. Perform research & development, which may include, for example, conducting data analysis and research in order to develop new or enhance existing products and services, and performing quality control activities;
 4. Dispense surveys and questionnaires to collect Additional User Information for use in the Services, as well as facilitating product development and research initiatives;
 5. Conduct analytics to improve our Services and track the usage of our Services;
 6. Offer new products or services to users through emails and promotions;

7. Comply with the law and requests from government bodies; and
 8. Carry out online marketing campaigns and targeted advertising, including utilizing third-party ads (subject to your cookie settings), and to measure the performance of our marketing and targeted advertising.
2. **FamilyTreeDNA uses your Genetic Information for the following primary purposes:** This may include, in addition to other things not specifically mentioned, using your information in a manner consistent with other commitments in this Privacy Statement to:
1. Deliver DNA matches (e.g., close relatives or distant cousins) from our database, ethnicity results, and other information to assist you in learning more about yourself and your genetic relatives;
 2. Connect you with your relatives in our database through features such as DNA matching or other product features;
 3. Present you with other insights into what your DNA uncovers about traits, personal health and wellness;
 4. Based on your DNA Data, invite you to participate in optional surveys;
 5. Provide relevant results to aid you in identifying common ancestors and other information about your family history, as well as helping you unite with family;
 6. Examine aggregated Genetic Information to gain further understanding of population and ethnicity-related health and wellness
 7. Perform statistical, scientific, and historical research;
 8. Comply with requests from law enforcement or their authorized representatives that meet our [Law Enforcement Guidelines](#);
 9. Strengthen features and functionality in our existing DNA-related products, enhancing the customer experience across FamilyTreeDNA products, improving the quality of our laboratory technology and processes, and building new products and services, including services akin to personal health and wellness.

You may be able to adjust your preferences of having your information used for specific activities. See the below Section 5 to learn more.

We will seek additional consent from you before we collect and process Sensitive Information as part of your interaction with the Services.

5. How FamilyTreeDNA shares your information

FamilyTreeDNA does not share your individual Personal Information with third parties without your additional consent other than as described in this Privacy Statement. We will never share your Genetic Information with pharmaceutical or insurance companies, employers, or third-party marketers without your express consent. The circumstances described below explain when sharing might occur:

1. **FamilyTreeDNA users or others you may choose to share with:** Depending on your account settings, your FamilyTreeDNA Profile Information (see section 3.A.i.d) and your public family tree details, may be viewable to other FamilyTreeDNA users, including your DNA matches and matches whose accounts are managed by law enforcement (dependent on your matching preferences). If you consent to participate in matching and depending on your

additional settings, some of your Genetic Information may be viewable to your DNA matches, including matches whose accounts are managed by law enforcement, as well as your mutual matches. You may review this information in the Learning Center and make adjustments in your Privacy & Sharing settings. In addition to the Personal Information mentioned in this section, Group Project Administrators of Group Projects you have chosen to join or Group Projects your matches have chosen to join, will be able to view certain DNA results (e.g., Y-DNA and mtDNA markers). Pseudonymized DNA marker information can also be shared publicly via any Group Project you chose to join. To change your settings, please go to the links below in Section 7.A.

To share details of your family history or DNA information outside the Services, means to do so at your own risk.

2. **Information shared with commonly owned entities:** Some or all of your information may be shared with other companies under common ownership or control of FamilyTreeDNA, which may include our corporate parent, our subsidiaries, or any other subsidiaries owned by our corporate parent to provide you better service and improve user experience.
3. **Service Providers:** We use the services of other companies to help us provide the Services to you. As a result, these partner companies will have some of your information in their systems. Our partners act only at the direction of FamilyTreeDNA and are subject to contractual obligations governing data security and confidentiality consistent with this Privacy Statement and applicable laws. These partners include our DNA test shipping providers, credit card processors, cloud services infrastructure providers, and vendors that assist us in marketing, analytics, fraud prevention, and Member Support.
4. **For Legal or Regulatory Process:** We may use the information you have provided to us in order to comply with the law and requests from government bodies. This means that we may provide information that we collect from you if that information is relevant to a court subpoena or to a law enforcement authority or other government investigation, provided this is permissible under applicable data protection law.

We may share your Personal Information if we believe it is reasonably necessary to:

1. Enforce or apply the FamilyTreeDNA Terms and Conditions;
2. Comply with a valid legal process (e.g., subpoenas, warrants, etc.) and other requests from or on behalf of law enforcement that comply with our [Law Enforcement Guidelines](#);
3. Protect the security or integrity of the Services; or
4. Protect the rights, safety, or property, of FamilyTreeDNA, our employees or users.

If compelled to disclose your Personal Information to law enforcement, we will do our best, unless prohibited by law, to provide you with notice.

5. **Law Enforcement Matching (LEM):** For requests made by law enforcement and their authorized representatives that meet the requirements of our [Law Enforcement Guidelines](#), FamilyTreeDNA may create limited access law enforcement accounts (“LE Accounts”) which are permitted to upload genetic information to the database to identify the remains of a deceased individual or to identify the perpetrator of a homicide or sexual assault. FamilyTreeDNA will track Law Enforcement Accounts via an in-house identification system that will allow users to opt out of Law Enforcement Matching.

Users will only be viewable to the law enforcement account if ALL of the following requirements are met:

- The user has opted into matching
- The user has not opted out of Law Enforcement Matching
- The user and the law enforcement account have the same matching levels selected
- The user is genetic relative (also referred to as a match or DNA relative) to the genetic file uploaded to the law enforcement account

If a law enforcement account is a genetic relative and meets the above requirements, the information of yours that they will have access to is identical to that of your other matches. For further information on what [Personal Information matches may see](#), please visit the Learning Center.

Law enforcement accounts cannot join or participate in Group Projects. If you opt out of Law Enforcement Matching, law enforcement accounts will not be able to see you as a match or view any personal information viewable by matches. You have the ability to adjust your Law Enforcement Matching preferences at any time in your Privacy & Sharing settings located in your Account Settings.

Please note, if you decline to participate in law enforcement matching, we may still be required to share your Personal Information to comply with a valid legal process as described in Section 5.D. Law enforcement matching is only permitted with accounts set up by FamilyTreeDNA on behalf of law enforcement authorities and their authorized representatives. Any other use of the matching database for law enforcement purposes violates our [Terms of Service](#). Although FamilyTreeDNA relies on law enforcement officials and authorized representatives to identify themselves when requesting use of the site and FamilyTreeDNA has implemented controls to identify and prevent uses of the Services which violate our [Terms of Service](#), FamilyTreeDNA cannot guarantee that law enforcement officials and their authorized representatives follow the requirements stated in our [Terms of Service](#) and [Law Enforcement Guidelines](#). Use of the Service for law enforcement purposes is a privilege, not a right. FamilyTreeDNA reserves the right to revoke law enforcement’s account access for any reason without warning, including any use of the account for any law enforcement purpose not expressly agreed to by FamilyTreeDNA.

6. **If FamilyTreeDNA is acquired:** If FamilyTreeDNA or its businesses are acquired or transferred to another entity (in part or in whole and including in connection with any bankruptcy or similar proceedings), we will share your Personal Information with that entity. The promises in this Privacy Statement will apply to your Personal Information as transferred to the new entity.
7. **"Targeted Advertising" service providers:** We allow third-party advertising networks and providers to collect Web Behavior Information on our Service to help us to deliver targeted online advertisements to you. Using cookies and similar technologies (such as JavaScript, web beacons, device identifiers, location data, and clear gifs), they collect information about your browser's or device's visits and usage patterns on our Services and on other websites over time. This helps us better personalize ads to match your interests and to measure the effectiveness of ad campaigns.

You may have the option to change your settings as described in our Cookie Policy if you do not wish us to use data about your interests or behaviors to serve you targeted ads. For information on "Do Not Track" please see our [Cookie Policy](#).

For more information about our marketing and advertising practices, please review our [Cookie Policy](#).

8. **Aggregate Information:** FamilyTreeDNA may show user information in an aggregated form as part of the Services or our marketing, or in scientific publications published by our research partners or us. Such disclosure will never include Personal Information
9. **Research Partners:** We do not share, trade, or barter your genetic information. If at any point in the future we change our policy in regards to research partners, we will ask for your express consent to share your Genetic Information with any research partner.

6. Using information for research with your consent

You have the choice to participate in future genetic research opportunities.

1. **Consent process for research:** Users wishing to participate in genetic research projects may indicate so and will be included in a candidate pool. If you become a potential candidate for a research project, you will be contacted to grant specific consent for every individual research project opportunity. Once given, consent cannot be revoked for research that has already occurred or is underway.
2. **If you no longer consent to FamilyTreeDNA Research:** Consent for future research can be revoked by notifying FamilyTreeDNA that you wish to be removed from the candidate pool or by declining invitations to participate in specific research projects. Removing yourself from the research candidate pool means that you will not receive any invitations to participate in research projects.

7. Your options and ability to access to your personal information

Subject to particular exceptions, you have a right to request access to your Personal Information and to be given a copy of certain information you provided in a portable

format, as well as to seek to update, delete, or correct this information by using the tools described below or by contacting FamilyTreeDNA. Details and options for obtaining this information are below.

1. **Access to your account:** FamilyTreeDNA also provides privacy and security settings that allow you to control the visibility of your personal data to your matches and in any Group Project that you have joined. You have access to and may update the Personal Information (such as name, email address, profile information, etc.) that you provide to FamilyTreeDNA at any time in the following sections of the profile settings: [Account Information](#), [Privacy & Sharing](#), [Project Preferences](#), [Genealogy](#), and [Notification Preferences](#). To learn more about how to manage your privacy settings, click [here](#).

Testers have the option to assign a beneficiary to their account in the event that they become deceased. Only in the event that FamilyTreeDNA is notified about a deceased tester, will account information be shared with the specified beneficiary. In the case that a beneficiary is not specified and upon verification of the deceased user, ownership may default to FamilyTreeDNA. To learn more about managing beneficiary settings, you can click [here](#).

To learn more about managing privacy settings for family trees you have created on FamilyTreeDNA, you can click [here](#).

2. **Marketing Communications:** By creating an account, you are agreeing that we may send you promotional emails about our Services. You have the option to opt out of receiving specific messages or notifications from us by visiting your [Notification Preferences](#) in your account. You also have the option to click "unsubscribe" at the bottom of promotional email communications. Please note that you may not opt out of receiving non-promotional messages regarding your account, such as Service-related emails or purchase confirmations.
3. **Genetic Information Download:** Your DNA Data belongs to you. You always have the option of downloading files with your DNA Data. Learn how [here](#). For more information on what is included in your DNA Data downloads, go [here](#).
4. **Information you choose to share with others:** FamilyTreeDNA gives you the ability to share information with other individuals who have FamilyTreeDNA accounts through (i) our community forums, (ii) relative finding features (e.g., "Matches"), (iii) Group Projects, and (iv) other sharing features. Please refer to settings in your profile. Some sharing may require you to opt in, but some features may require an opt out, such as Law Enforcement Matching. For example, we provide the ability to opt in to share your ethnicity results (myOrigins) with your DNA Matches. Alternatively, if you have consented to participate in the DNA Matching Database, you may opt out or change the visibility of your profile information by visiting your Settings. Also, please note that certain types of your User Provided Content may be viewable by other FamilyTreeDNA users, and once posted, you may not be able to modify or delete certain content.

You may choose to disclose your personal information to family members and/or friends and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website through our application programming interfaces ("API"). These third parties may use your personal information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved in the transaction.

Personal information, once disclosed or shared, can be difficult to contain or retrieve. FamilyTreeDNA will have no liability or responsibility for any consequences that may result because you have released or shared personal information with others. If you have access to the personal information of a FamilyTreeDNA customer through an account you manage, we urge you to recognize your responsibility to protect the privacy of the person in the account. It is the responsibility of all users to share personal information and account access only with people they know and trust. Users managing multiple accounts should use caution in selecting profile settings.

5. Participation in Group Projects

FamilyTreeDNA gives you the ability to participate in Group Projects and to share information with other Project Members and Group Project Administrators. Information that you have shared as part of your participation in a Group Project is shared at your own risk, and FamilyTreeDNA will not be obligated to remove any information or User Provided Content that may be made public as part of your participation.

Group Projects may have public pages displaying pseudonymized member results so that members can share information more easily. This may include Group Project member results by kit number. Group Project pages may include participant surnames, oldest known ancestors, and their country of origin.

Any changes you make to your permissions or privacy settings can experience a delay when updating on such public pages. For more information on Group Project participation, please see [Group Project Participation Terms](#).

6. How to leave a Group Project, delete your Personal Information, or close your FamilyTreeDNA account:

0. **How to leave a Group Project:** You may leave a Group Project at any time by clicking the relevant "Leave" box(es) on your Project Preferences page or by sending an email to groups@familytreedna.com advising which project you wish to leave. We will comply with such requests within a reasonable timeframe and will send an email to the Group Project Administrator(s) requesting that they erase your public-facing information from any website maintained outside of FamilyTreeDNA as well as any of your data from their files. If you have posted information to a Group Project's forum, whether maintained by FamilyTreeDNA or elsewhere, or to any social media platform, Group Project Administrators will not have the ability to remove said posts.

1. **How to delete your Personal Information:** Deleting your personal information from FamilyTreeDNA can be done in different ways through the settings linked above in section 7.A. of this document.

If you need support deleting the Personal Information you provided in your profile, please contact [Customer Service](#).

If you have shared information through the Services, such as sharing your results directly with other Users or a Group Project Administrator, FamilyTreeDNA will not have the ability to delete any copies of information other FamilyTreeDNA members may have received, nor will FamilyTreeDNA be obligated to delete posts from the Activity feed.

2. **How to delete your Genetic Information:** If you no longer wish for us to have your Genetic Information, please contact [Customer Service](#) with your request, and we will remove all Genetic Information (DNA matches, ethnicity estimates, etc.) from your account (or profile) within a reasonable timeframe of your request.

To request the destruction of your swab samples, please contact [Customer Service](#).

3. **How to close your FamilyTreeDNA account:** You may request at any time to close your FamilyTreeDNA account and for your DNA test results and contact information to be deleted from FamilyTreeDNA. To close your account, please contact [Customer Service](#).

As stated in any applicable Research Consent Document, however, Self-Reported Information and/or Genetic Information that you have already provided and for which you have given consent to use in FamilyTreeDNA Research cannot be deleted from ongoing or completed studies that use the information. However, your information will not be used for any future research projects.

We may retain limited information as reasonably necessary to resolve disputes, prevent fraud, comply with legal obligations, as well as to comply with accounting and audit purposes, and clinical regulatory compliance requirements.

FamilyTreeDNA acknowledges that individuals have the right to access the personal information that we maintain about them. An individual who seeks access or who seeks to correct, amend, or delete inaccurate or all data, should contact us at ombudsman@genebygene.com. If your request is for the removal of data, we will respond within a reasonable timeframe.

8. Important Information

1. **Privacy Shield:** FamilyTreeDNA has certified its compliance with both the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of

personal information transferred from the European Union and Switzerland to the United States, respectively. FamilyTreeDNA is committed to subjecting all personal data received from the European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, listed under Gene By Gene, Ltd., please visit [U.S. Department of Commerce's Privacy Shield List](#).

FamilyTreeDNA's accountability for personal data that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, FamilyTreeDNA remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages in processing the personal data on its behalf do so in a manner inconsistent with the Principles unless FamilyTreeDNA proves that it is not responsible for the event giving rise to the damage.

In compliance with the EU-US and Swiss-US Privacy Shield Principles, Gene by Gene commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact FamilyTreeDNA at:

Privacy Administrator
FamilyTreeDNA
1445 N Loop Suite 820
Houston, TX 77008
ombudsman@genebygene.com

FamilyTreeDNA has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

FamilyTreeDNA is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

2. **Security:** FamilyTreeDNA places great importance on the security of all our customers' information. We have reasonable and adequate security measures in place to attempt to protect against the loss, misuse, or alteration of customer data under our control. For example, our security and privacy practices are periodically reviewed and enhanced as necessary and only authorized

personnel have access to Personal Information. We use secure server software to encrypt financial information you input before it is sent to us and we only work with third parties who have met and commit to our security standard. While we cannot guarantee that loss, misuse or alteration of data will not occur, we use commercially reasonable efforts to prevent this.

3. **Business Transactions:** In the event that FamilyTreeDNA goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.
4. **Linked Websites:** FamilyTreeDNA provides links to third-party websites operated by organizations not affiliated with FamilyTreeDNA. FamilyTreeDNA does not disclose your information to organizations operating such linked third-party websites. FamilyTreeDNA does not review or endorse and is not responsible for the privacy practices of these organizations. We encourage you to read the Privacy Statements of each and every website that you visit. This Privacy Statement applies solely to information collected by FamilyTreeDNA.
5. **Children's Privacy:** FamilyTreeDNA is committed to protecting the privacy of children as well as adults. Neither FamilyTreeDNA nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect a DNA sample from, create an account for, and give information related to his or her child if they are between the age of 13 and 18. The guardian or parent assumes full responsibility for ensuring that the information that he/she shares with FamilyTreeDNA about his or her child is kept secure and that the information submitted is accurate.
6. **Changes to Privacy Statement:** We may choose to modify this Privacy Statement at any time. We will provide advance notice of any material changes to this Statement, such as sending you an email or posting a notice to allow you the opportunity to survey the changes and decide whether to continue using our Services.

Non-material changes to this Statement will be notified as of their effective date by posting a notice through the Services on our website or by sending you an email. After notice of non-material changes, your continued use of our Services means that you consent to the updated Privacy Statement.