

The Jewish Federations of North America
Privacy Policy

Effective Date: March 19, 2020

Privacy Statement and Cookie Policy¹

General Purpose

The Jewish Federations of North America, Inc. (“we,” “our,” “us,” or “JFNA”), a 501(c)(3) not-for-profit organization dedicated to improving people’s lives locally and globally, respects your privacy and recognizes the importance of protecting your personal information. We have prepared this Privacy Statement and Cookie Policy (the “Privacy Policy”) to help you understand important information about JFNA’s privacy practices. This Privacy Policy describes our privacy practices in connection with our collection of your personal information through all our online website properties and any content delivered by JFNA through our websites and applications, including, but not limited to, our blogs, events, donation, and volunteer sign-up pages, social media pages, and mobile apps (collectively, the “Sites”) and voluntarily provided by you through other methods of communication such as via the phone, in-person meetings, emails or in response to mailings (collectively, “Other Communications”). “You” or “your” refers to any person using the Sites or communicating with JFNA through Other Communications.

This Privacy Policy describes the kinds of personal information from or about you that we (or our service providers acting on our behalf) may gather via the Sites or through Other Communications, how we use, share and protect such information, and how you can manage your preferences concerning our uses and sharing of such information.

¹ Note to JFNA: Sidley has positioned this Policy as a “Privacy Statement and Cookie Policy,” and has modified the Cookie section of this policy, in lieu of drafting a separate Cookie Policy. Also, a “cookie banner” that would appear clearly and prominently on JFNA’s home page, and that would link to “Tracking Data & Cookie Policy” section in the Policy, could state:

“[Cookie Banner]

We use cookies on this website. These cookies collect information related to your browsing sessions that are used to tailor your volunteering and donation experience, and for advertising, analytics, and improving the site. By closing this box or using the site, you agree to our use of cookies. To learn more, including how to change your settings, please see our [Cookie Policy](#).”

This Privacy Policy forms part of our online Terms and Condition of Use, which can be found at the following web link: www.jewishfederations.org/terms-and-conditions. Please read each document carefully.

By visiting the Sites or communicating with JFNA through Other Communications, you consent to our collection, use, processing, and sharing of personal information about you as described in this Privacy Policy and in our Terms and Conditions of Use. If you do not agree to this Privacy Policy or our Terms and Conditions of Use, please do not use the Sites or otherwise provide us with your personal information. You may decline to provide any personal information to JFNA, but please understand that you may be unable to register on our Sites or participate in activities or services offered by JFNA.

We may revise this Privacy Policy from time to time. We will post any changes on this page, and update the “Last Updated” date at the bottom, so please check back periodically to stay aware of any modifications. Your use of the Sites or continued voluntary engagement with JFNA through Other Communications after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.

What Personal Information Do We Collect?

User Provided Information

We may collect three types of information that users provide when interacting with our Sites or through Other Communications:

- *Personal Information* - information that identifies (whether directly or indirectly) a particular individual, such as the individual’s name, home and seasonal mailing addresses, personal and work email address, and telephone number. When anonymous information is directly or indirectly associated with personal information, the resulting information also is treated as personal information.
- *Anonymous Information* - information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual.
- *Aggregate Information* - we may use personal and de-identified or anonymous information to create a third type of information - aggregate information. Aggregate information means information about groups or categories of individuals, which does not identify and cannot reasonably be used to identify an individual.

For example, we collect:

- Information you provide when you create an account, register for an event or activity, apply for a job, contact us, or engage in any other method of submission, such as your first and last name, personal and work email address, full work, home and seasonal mailing addresses, home, work and/or mobile telephone number, work and employment histories,

username, password and any other information, preferences, content, files or media you submit as part of that form;

- Transaction information you provide when you make a donation or pay for an event or activity, such as first name, last name, full mailing address, telephone number, and payment information;
- Information you provide in forums on our Sites and applications, such as your posts, images, videos, documents or any other materials shared;
- Information sent either one-to-one or within a limited group using our message, chat, post, or similar functionality, where we are permitted by applicable law to collect this information;
- Information we obtain from a third party, such as a site or platform provider, about use of our applications on third-party sites or platforms;
- Location information, including location information provided by a mobile or other device interacting with one of our Sites or applications (including through beacon technologies), or associated with your IP address, where we are permitted by law to process this information;
- Activity information about your use, and the use by any person(s) you authorize through your account, of our Sites and applications, such as the content you view or post, how often you use our services, and your preferences; and
- Usage, viewing, technical, and device data when you visit our Sites, use our applications on third-party sites or platforms, or open emails we send, including your browser or device type, unique device identifier, and IP address.

Tracking Data & Cookie Policy

We make limited use of cookies and other online tracking technologies to understand visitor activity on our Sites, and to hold certain information about your visits to help improve your experience while using the Sites.

A cookie is a text file sent by a web server and placed on your computer by your web browser. Cookies can be divided into two different types: session and persistent. Session cookies differ from persistent cookies primarily in that session cookies are temporary and expire and are normally typically deleted when you close your browser. Persistent cookies, in contrast, remain stored on your computer after you close your browser until they are deleted either because they expire or you delete them. JFNA may use session cookies and persistent cookies in connection with providing our Sites.

You may instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, part of the Sites may function differently and not as well and you may not be able to use some portions of our Sites.

The types of cookies we may use are:

- Session Cookies. We may use session cookies to operate our Site and for security purposes.

- *Persistent Cookies.* We may use persistent cookies to remember your preferences and various settings.

Cookies are often used in conjunction with other Internet technologies, such as web beacons or pixels, to understand behavior on the Internet.

Although we use the services of third parties in connection with these cookies, we do not allow the third-party service provider to use personal information about the users of our Sites for their own purposes.

None of these cookies are strictly necessary to access our Sites. You may reset your browser to refuse all cookies or to allow your browser to alert you when a cookie is set, however, certain parts of the Sites may function differently and not as well and you may not be able to use some portions of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our Sites will use cookies when you logon to the Sites. For more information about how to manage your cookies preferences, you should use the “help” menu of your web browser or explore the customer support sections of your web browser. Please note that you need to configure each browser on each device that you use if you wish to opt-out or block some or all cookies. If you do not wish to receive advertising cookies, you may wish to visit the Network Advertising Initiative website by clicking here <http://www.networkadvertising.org/choices> and the Digital Advertising Alliance website here www.aboutads.info/choices.

Website Performance Analysis

Google Analytics: We use Google Analytics, which is provided by Google Inc. Google Analytics cookies help us improve our website by providing us with aggregate statistics on how many users visit it, which parts of the site are viewed the most, the city or regional location of those users, device type and browser. These cookies do not identify you personally. Nevertheless, if you prefer to prevent Google from collecting data generated by cookies and relating to your use of the website (including your IP address) as well as from processing this data by Google by downloading and installing the Browser Add-on on <https://tools.google.com/dlpage/gaoptout?hl=en>

Facebook Pixel: We use Facebook Pixel, which is provided by Facebook, Inc. Facebook Pixel cookies help us to measure the return on investment of Facebook Ads by reporting on the actions people take after viewing those ads. We create pixels that track conversions, add them to the pages of their website where the conversion will happen and then track these conversions to ads they are running on Facebook. No personal information is contained or collected as a result of using these cookies or pixels. If you want to opt out of Facebook Pixel cookies, please use the following link: <http://optout.networkadvertising.org/?c=1>

Website Advertising

Google Adwords: We use Google Adwords, which is provided by Google Inc. Google Adwords conversation tracking cookies help us to measure and optimize the performance and user experience related to our ads in Google Search or selected Google Display Network sites. These cookies do not identify you personally. Learn more about Google's privacy policy on

<https://policies.google.com/privacy?hl=en> and for opt out visit <https://www.google.com/settings/u/0/ads/authenticated?hl=en>

We also use cookies to allow you to share content directly on social networking/sharing sites like Instagram, Facebook and Twitter. Examples would be if you wanted to share content from our websites to one of your social networks. We don't control the setting of these third-party cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

You may block cookies also by activating settings on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our Sites.

Session cookies will expire whenever you close your browser or shut down your computer, and such cookies need not be blocked. Persistent cookies used for specific purposes as described above will expire when that purpose is no longer required, such as when a survey closes.

You can find out more about how to block cookies in specific browsers at <http://aboutcookies.org>.

How We Use and Share Personal Information

Uses of Personal Information

We use personal information submitted by you or otherwise collected through our Sites and through other sources for the purposes described in this Privacy Policy. We collect and use your information to operate the Sites and manage the services you request. This includes processing listservs, newsletter subscriptions, message boards, broadcast emails, webinar and event registrations, processing donations, and registration for activities or opportunities. It also includes alerting recipients on our email list of upcoming events, fundraising campaigns, programs, and news so they may stay current on new developments related to JFNA and/or Jewish Federations. We may use your personal information for confirmation of donations, registrations, or other actions you take on our Site, and for related customer service needs. We may periodically contact you with offers, surveys, and information about our services or the services of our subsidiaries, grantees and affiliates, your subscription, legal notices, or other important information. JFNA may communicate with you via email, mailings, phone calls and social media messaging. If you are a registered user, you may alter your user profile in order to remove your name from our e-mail recipient list. If we intend to collect and use personal information for another purpose, we may seek your permission at the time the information is collected. For example, if you register for one of our events, we may seek your permission to share your personal information with other event attendees to encourage participant interaction at the event.

We may use the information that is not personally identifiable to analyze the design and functioning of our site in order to make site improvements. We may use such information in the aggregate to analyze site usage.

Sharing of Personal Information

We do not sell, rent, swap or trade your personal information. We may share your personal information with JFNA's member Jewish Federations, with other not-for-profit organizations that collaborate with JFNA to further our charitable mission, or as otherwise described at the point where we collect the information from you for the purposes described in this policy statement. We will share your personal information in the event that it is necessary for any of the following reasons:

- to protect our rights or property or the safety of our employees or others;
- to comply with any court order, legal process, or respond to any governmental or regulatory request;
- to transfer information in the event of a merger, transfer of assets, or other organizational restructuring; and/or
- to prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

We also use trusted third-party service providers or other third-party organizations helping to support our mission by collecting, storing, processing, or sharing personal information on our behalf, such as to complete your donations and other payments you make to JFNA. We engage with third parties to assist with supporting our operations and business needs, including vendors in the following areas: (i) credit card or payment processors; (ii) cloud storage providers; (iii) customer support tools; (iv) data collection platforms; (v) product development tools; (vi) IT and security providers; (vii) marketing tools; (viii) relationship management platforms; and (ix) analytics tools.

Your Choices Regarding the Personal Information We Collect

We will honor your choices concerning our collection, use, or sharing of personal information about you. For example, if you receive email communications from us (e.g., newsletters and communications regarding our services) but do not wish to receive further information, you may "opt out" of receiving such by following the instructions contained in those email messages. If you registered for an account on one of our Sites, whether to sign up for an event or otherwise, at any time you may request that we deactivate your account. You may also choose what information you supply when creating an account, registering for events, or otherwise interacting with us through the Sites. At any time, you may change your browser cookie settings, and you may also contact us to deactivate your account and stop receiving marketing or other communications at info@jewishfederations.org.

Information Security

Our Sites use appropriate procedures to ensure the security of your personal information and to protect it from unauthorized access. In particular, when we ask you to enter credit card information, we use the top industry standard security protection, encryption, Secure Sockets Layer (SSL) transmission connection, and a secure server for information storage.

JFNA is committed to maintaining your confidence and trust, and we take reasonable security measures to protect your information, including the use of appropriate physical, technical, and administrative controls. However, no security system is impenetrable, and no transmission or electronic storage of information is guaranteed to be secure. We therefore urge you to always use caution when transmitting information over the Internet.

Children's Information

The Sites are not intended for children under 13 years of age. We do not knowingly collect or store any personal information about children under 13 years of age through the Sites, unless provided by a parent, guardian, or other adult seeking our services on behalf of a child.

International Transfers

We are based in the United States. The information you submit to us and that we automatically collect as a result of your using the Sites will be transferred to the United States, where the privacy and data protection rules may differ from those in your country. By using our Sites, you consent to the international transfer to, and storage of, your personal information in the United States.

Third-Party Links

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this privacy policy, and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications. Please also keep in mind that our sites and applications may contain links to other sites not owned or controlled by us and we have no responsibility or liability whatsoever for the content, actions, or policies of third party websites. The inclusion of third party websites on our Sites in no way constitutes an endorsement of the content, actions or policies of the websites of others. We encourage you to be aware when you leave our Sites or applications and to read the privacy policies of other sites that may collect your personal information.

We May Change this Notice

From time to time, we may change our privacy practices, and this Privacy Policy, because of changes in relevant and applicable legal or regulatory requirements, our business practices, or in our attempts to better serve your needs and those of our other customers. Notice of such changes to our privacy practices will be given in the manner described in the Terms and Conditions of Use and a revised Privacy Policy will be posted on the Site.

Contact Us

If you have any further inquiries about our Privacy Policy or practices, or wish to change your preferences concerning our uses or sharing of your information, please contact us at:

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