

PR HOCKEY ENTERPRISES INC.

Privacy Policy

Updated: May 20, 2021

At PR Hockey Enterprises Inc. ("PRE"), we are committed to providing our customers and users with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our customers and users, protecting their personal information is one of our highest priorities. By using any PRE service, application, product and/or website (collectively, the "PRE Services") or otherwise communicating with us, you are agreeing to the terms of this Privacy Policy. If you do not agree with any of these terms or any other terms that govern the PRE Services, please exit our site or delete our mobile application and do not submit information to us in any way. By continued use of the PRE Services and/or clicking "I agree", "I accept", "I consent" or any similar prompt provided at the time you establish an account with us or at any other time, you signify your consent to the collection and processing of both your personal information and, where applicable, your child's user account information, and any resulting correlation of such information, as set forth in this Privacy Policy.

General

Our use of the personal information we collect from our customers and users is subject to the British Columbia *Personal Information Protection Act* ("PIPA") and/or the federal Canadian *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). PIPA and PIPEDA (as applicable) set out the ground rules for how British Columbia businesses and not-for-profit organizations may collect, use and disclose personal information. Other privacy legislation in your jurisdiction of residence (each a "Foreign Privacy Law") may also be applicable by operation of law. To the maximum extent permitted by any applicable Foreign Privacy Law, in the event of any conflict or inconsistency between such Foreign Privacy Law and this Privacy Policy, the terms of this Privacy Policy shall prevail. Where this is not permitted or is not possible under any applicable Foreign Privacy Law, you may be required to discontinue your use of some or all of the PRE Services.

In accordance with PIPA and PIPEDA (as applicable), we will inform our customers and users of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

When you provide us with your or, where applicable, your child's personal information, you acknowledge that the information will be stored and processed on servers located in Canada and/or the United States. In the future, our business may require that we contract with service providers outside Canada and the United States to carry out certain functions on our behalf such as data back-up or storage. In such situations, such service providers will be contractually obliged not to disclose your and/or your child's personal information except where authorized to do so by law or by PRE. Should a need to transfer your and/or your child's personal information

arise, we will ensure that the selected service providers meet our privacy standards before we enter into contracts with them. We will also require them to secure and maintain confidentiality over your information.

This Privacy Policy, in compliance with PIPA and PIPEDA (as applicable), outlines the principles and practices we will follow in protecting the personal information of our customers and users. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of that personal information and allowing our customers and users to request access to, and correction of, their personal information.

CALIFORNIA USERS: This Privacy Policy contains special provisions for users residing in California. If these are applicable to you, please review them carefully. Under California Civil Code Section 1798.83 (also known as S.B. 27 or the "Shine the Light" law), if you are a California resident and your business relationship with PRE is primarily for personal, family, or household purposes, you may request certain data regarding PRE's disclosure, if any, of personal information to third parties for the third parties' direct marketing purposes. To make such a request, please send an email message to privacy@puckrecruiter.com with "Request for California Privacy Information" in the subject line. You may make such a request up to once per calendar year. If applicable, we will provide you, by email, a list of the categories of personal information disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the third parties' names and addresses. Please note that not all personal information sharing is covered by the S.B. 27 requirements.

EUROPEAN UNION USERS: In addition to the policy above, European Union users also choose to delete their accounts at any time. To delete your Puck Recruiter account please complete the following steps:

- 1) Log into your account at www.puckrecruiter.com or on the Puck Recruiter mobile application.
- 2) Click on "Manage Account" at the top of the page.
- 3) Scroll down to the bottom of the presented options and click "Delete Account".
- 4) You will be prompted to confirm your decision.
- 5) If you agree to this decision, you will be logged out and your account deleted.
- 6) **NOTE:** This decision is permanent. It cannot be reversed once completed. All purchase details will be removed, so you will no longer be able to receive customer support.

Scope of this Policy

This Privacy Policy applies to PRE and to any service providers collecting, using or disclosing personal information on behalf of PRE. This Privacy Policy does not apply to any service providers or other parties that you choose to link to your account or otherwise provide access to any account or personal profile you establish with PRE.

Definitions

Personal Information –means information about an identifiable individual, which may include such information as name, age, gender, home address and phone number, e-mail address and credit card information. Personal

information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or by PIPA or PIPEDA (as applicable).

Privacy Officer – means the individual designated from time to time by PRE as having responsibility for ensuring that PRE complies with this policy and with PIPA and PIPEDA (as applicable).

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the customer or user voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 When you interact with PRE, we may collect and store information from you directly as described below. PRE collects personal information that is voluntarily provided by you when you order a product or service, enter promotions, answer our polls or surveys, register on the PRE Services, or communicate with us by mail, telephone or electronically. PRE also collects personal and non-personal information automatically as described below. The type of information we collect and maintain may include your name, mailing address, email address, telephone number, gender, date of birth, purchase history, chat room communications, complaints you may have about our products or services, a record of promotions offered to you, and your PRE Services preferences. Other information, such as your IP address, system information (including operating system, browser type, available software and hardware), whether you were referred to us by a search engine (including the search term(s) used to find us), and how much time you spend using the PRE Services are collected to improve the PRE Services and messaging efficiency, learn more about where our users come from and understand how our users use and ways to improve the PRE Services. We will only collect personal information of customers and users that is necessary to fulfill the following purposes:
 - To verify identity;
 - To verify that the customer or user meets our minimum age requirements;
 - To verify credit information;
 - To identify customer and user preferences;
 - To understand the needs of our customers and users with respect to our products and services and enhance their experience using our products and services;
 - To open and manage a user account and/or personal profile (where applicable);
 - To determine eligibility for and/or to deliver requested products and services;
 - To deliver notices, updates, alerts and other information concerning our products and services that may be of interest to our customers and users;
 - To ensure a high standard of service to our customers and users;
 - To collect and process payments;
 - To properly investigate and respond to any complaints, questions or concerns you may have about the PRE Services
 - To meet regulatory requirements; and
 - To enable related entities and third party service providers to deliver requested products, services and/or information and to accomplish the purposes described in Policy 1.

The information we collect from you or, where applicable, your child enables access to and participation

in the PRE Services, including as follows:

- **Registration.** During the registration process, you or, where applicable, your child may be asked to set up a user name and password. We strongly recommend that your child not use any personally identifiable information as his or her user name, as this user name may be visible to others on the Service. You and/or your child may be asked to provide your email address to be used for recovering usernames and/or passwords.
- **User Surveys/Feedback.** We may collect aggregated information in connection with surveys or other online activities that allow your child to give us feedback, including during beta test phases of the PRE Services. We do not collect any personally identifiable information in connection with surveys or feedback requests, nor is the information provided connected to any personally identifiable information we may have about end users.
- **PRE Services Management.** We may collect information through technological systems and analysis (such as logging IP addresses) for routine system administration purposes, to make the PRE Services more interesting and effective for you and/or your child, or to manage content delivery. For instance, we may collect IP addresses and use technology to track traffic patterns on the PRE Services. Once you or, where applicable, your child has logged into the PRE Services, we may track your and/or your child's activities by using logs of database transactions and server interactions. We also use this information to understand which areas of the PRE Services are more appealing or less appealing and to deliver content that is specific to your country or jurisdiction of residence. As noted below, the PRE Services may also use cookies, which are pieces of information that the PRE Services sends to your or your child's computer while your and/or your child is viewing or otherwise interacting with the PRE Services. Cookies provide information to the PRE Services so that the PRE Services will remember the user. These technical methods may involve the transmission of information either directly to us or to our third party service providers who are subject to the protections described in this Privacy Policy. None of the information collected through these methods is connected to or associated with any other information about end users.
- **E-mails from Users.** If you or your child contact us by email or enter an email address when participating in a contest or other online event, we use the email address only to respond one time to your or your child's specific request and, if legally permissible, to notify them if they won a contest or of the outcome of the event.
- **Regular Mail from Users.** If you or your child want to contact us by regular mail, and the PRE Services provides a submission form for such a communication, you may do so using such submission form. The submission form may ask for your child's user name and name of his or her PRE Services avatar or icon (if any), and your (the parent/guardian's) name and signature.
- **PRE Services Chat Features.** The current version of the PRE Services chat features are intended for use solely by users who have attained the age of majority in their jurisdiction of residence and end users who are at least 13 years old, have obtained the express permission of their parent or legal guardian to use the chat feature and for whom no other legal restrictions apply to such use. The current chat feature is not intended for use by children under the age of 13 without direct supervision by a parent or legal guardian. PRE strongly recommends that all use of the current chat feature by any child be regularly monitored by a parent or legal guardian. In the future, the PRE Services may include a restricted chat feature specifically designed for use by children under the age of 13 without direct supervision of a parent or legal guardian.
- **Safety and Security.** We may collect your and, where applicable, your child's name and email address as well as other personal information, with applicable notice to you and consent, if necessary, for your and/or your child's safety. We may also collect your and/or your child's name and email address for the limited purposes of protecting the security and integrity of the PRE Services, taking precautions against legal liability, responding to the judicial process, as we may determine in our reasonable judgment is necessary and/or advisable to protect our users, ourselves, our partners, agents and providers, and the general public or for law enforcement on a matter related to public safety.
- **Purchases For Children.** If you are a parent or legal guardian, and will be purchasing licenses for codes to PRE Services-related products or services and sending the purchased codes to your child,

please be advised that such activity may correlate your child's user account information to your personal information obtained during the purchase process. Although PRE does not generally correlate this data, in rare circumstances this may be necessary to assist with your use of the PRE Services, or otherwise. In compliance with applicable laws we must inform you of the possible correlation and obtain your consent to such correlation should it occur.

1.3 We may also collect information related to your use of the PRE Services, where applicable, such as:

- Device-specific information (e.g. hardware model, operating system information, unique device identifiers and mobile network information, including phone number) which we may associate with your PRE account;
- Log information (e.g. details of how you use our service, internet protocol address, system and device event information such as crashes, system activity, hardware settings, browser type, browser language and the date and time of use of our service, and cookies that may uniquely identify your browser or your PRE account); and
- Usage data concerning the usage of our service by authorized end users which we may use for any purpose, provided that we shall not use any Personal Information comprising any usage data except for the purposes outlined in policy 1.2 and the two preceding paragraphs of this policy 1.3.

1.4 **About Cookies** - We may collect and store information related to your use of our services by sending one or more cookies or anonymous identifiers to your device.

1.5 **Children Under the Age of 13 Years** - Some parts of the PRE Services are not intended for children under the age of 13 and we do not knowingly collect information from children under this age through the PRE Services. For the portions of the PRE Services that appeal directly to children under the age of 13, we incorporate into this Privacy Policy the following additional children's privacy provisions. When your child is asked to provide personal information, we will endeavour to provide you with an opportunity to consent to their disclosure of personal information in accordance with applicable law.

PRE urges all parents and legal guardians to supervise their children's exploration of the Internet and any online services, and to teach their children about protecting their personal information online. If you reside in the United States, we encourage you to visit the following link for more information about Children's Online Privacy Protection rule ("COPPA") and children's privacy:

<https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>

<https://www.consumer.ftc.gov/topics/protecting-kids-online>

1.6 **Anonymous Information** - We may gather non-personal information by means of cookies, beacons and other technology on an anonymous, aggregated basis. This information is not kept, used or disclosed at the individual level, but may be disclosed to third parties on an anonymous, aggregated basis. We may collect such information through unique identifiers such as cookies (which may be HTML files, Flash files, or other technology), web beacons, or similar technologies for analytical purposes, routine system administration, to make the PRE Services more interesting and useful to you, or to manage content delivery. For instance,

- We use technology to track traffic patterns on the PRE Service. Once you and/or your child have logged into the PRE Service, we track your and/or your child's activities by using logs of database transactions and server interactions. We also use this information to understand which areas of the PRE Service are most appealing or least appealing or to deliver content that is specific to your country or jurisdiction of residence;
- We use cookies, small text files stored on your hard drive, not the PRE Service, which allow you to store your password without having to constantly re-enter it. Cookies also help us to tailor messages that better match your needs and interests, and they allow us to better understand how users in general use the PRE Service, which in turn helps us to focus our resources on features that are most popular with our users.

1.7 **Third Party Advertising** - From time to time, we may use third party advertising service providers to serve ads on the Service. These companies may use cookie-based ad serving technology for the

purpose of (i) ad delivery and reporting; and (ii) re-targeting and/or online advanced targeting, provided, however, that your visit to the PRE Service shall be excluded from your online profile used for such advertising purposes. Furthermore, to monitor usage or transfer of content to another site or location and to collect advertising metrics, such third parties may include in the content web beacons or clear GIFs. Clear GIFs (a.k.a. web bugs, beacons or tags) are small graphic images placed on a web page, web-based document, or in an e-mail message. Clear GIFs are invisible to the user because they are typically very small and the same colour as the background of the web page, document or e-mail message. Because your web browser must request such content from the third parties' servers, such third parties can track your usage, or set their own cookies, just as if you had requested a web page from their site.

Although the third party advertising service providers may not have access to tracking technologies set by PRE, or any of your personal information collected on the PRE Services, they may themselves set and access their own tracking technologies and/or they may otherwise have access to information about you. The use of such technology by these third parties is within their control and not ours. Even if PRE has a relationship with the third party, it does not control their sites or policies and practices regarding your information.

This Privacy Policy does not cover any use of information that third party advertising service providers or advertisers may collect from you. We encourage you to investigate and ask questions directly of them in this regard. If you would like more information about the practices used by third party advertising service providers and advertisers and to know your choices about not having the information they gather used by these companies, visit <http://networkadvertising.org> and review your opt-out options. Please note that Flash cookies (also known as local shared objects) operate differently than browser cookies and cookie management tools available in a web browser will not remove Flash cookies. To learn more about and manage Flash cookies, visit www.adobe.com and make changes at the privacy setting panel. You are always free to decline our cookies if your browser permits, but some parts of the PRE Services may not work properly if you do.

Policy 2 – Consent

- 2.1 We will obtain the consent of our customers and users to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, electronically and/or through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the customer or user voluntarily provides personal information for that purpose. When you establish a user account or purchase products or services from us, you consent to the collection of your personal information for the purposes described in Policy 1.
- 2.3 Consent may also be implied where a customer or user is given notice and a reasonable opportunity to opt-out of his or her personal information being used for direct marketing of our services or products and the customer or user does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), customers and users can withhold or withdraw their consent for PRE to use their personal information in certain ways. A customer's or user's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the customer or user in making the decision.
- 2.5 We may collect, use or disclose personal information without the customer's or user's knowledge or consent in the following limited circumstances:
 - When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud;

- To investigate an anticipated breach of an agreement or a contravention of law; or
 - For other purposes authorized under PIPA or PIPEDA (as applicable).
- 2.6 We may allow you to "register" with us by using Facebook Connect™ or other Social Networking Service ("SNS") authentication options to create an account or profile on the PRE Services. If you access the Service from a third party SNS, you may be required to also read and accept the SNS Terms of Service and Privacy Policy. The information you allow PRE to access varies by feature, application and SNS, and it may be affected by the privacy settings you establish at the SNS. By accessing the PRE Services through an SNS, you are authorizing PRE to collect, store, and use in accordance with the Privacy Policy any and all information that you agreed the SNS could provide to PRE through the SNS Application Programming Interface ("API"). Your agreement takes place when you "accept", "consent" or "allow" (or similar terms) one of our applications on an SNS.
- 2.7 You have choices over how we collect, use and disclose certain of your personal information for certain purposes. Those have been indicated below, but please note that if you use the PRE Service, you must agree to our terms of use and the terms of this Privacy Policy without exception. Any comments or questions you may have regarding the collection, use and disclosure of your personal information should be directed to the PRE Privacy Officer as noted below.

You may choose not to receive certain email from us, even after granting permission initially, by unsubscribing. Instructions on how to unsubscribe from emails that are not related to processing of your transactions with us are included in each such email. (You may not unsubscribe from communications related to your Account administration or the processing of your transactions.) Certain jurisdictions may require that we provide a copy of the personal information we have on file about you or your child. If a jurisdiction applicable to you requires this, unless otherwise required by applicable law, all requests for a copy of the personal information we have on file about you, and requests to delete such information, must be made in writing and by postal mail addressed to: Privacy Officer, PR Hockey Enterprises Inc., c/o 300-1665 Ellis Street, Kelowna, British Columbia, Canada V1Y 2B3. PRE may require that you identify yourself to our satisfaction. In the event that you are unable to identify yourself or your legal rights to obtain your child's personal information we have on file, PRE may, consistent with applicable law, decline to provide this information. If we so decline, we will provide the reason(s).

Personal information provided by email may not be secure, and you assume the risks associated with your email transmission or our reply.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose customer or user personal information as described herein and/or where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- To conduct customer and user surveys in order to enhance the provision of our services;
 - To contact our customers and users directly about products and services that may be of interest to them; and
 - To enable related entities and third party service providers to deliver requested products, services and/or information.
- 3.2 If you opt-in and consent to receive offers, promotions or other information from PRE, your information will be used to provide you with promotional offers for PRE products that we believe may interest you and to solicit your opinion on our products and services. If you have opted in to receive these offers, we may also use your personal information to ensure that your contact information is accurate and up to date. PRE does not collect, use or disclose your personal information for online behavioral advertising purposes.
- 3.3 PRE may share your and/or your child's personal information with the other members of the PRE corporate group, and their respective successors and assigns, but only to the extent required to fulfill the purposes identified in this Privacy Policy. You may request that PRE not share your and/or your child's personal information with any of the other members of the PRE corporate group by contacting

our Privacy Officer as described below.

In addition to this inter-corporate sharing, PRE may disclose personal information to certain third parties as follows:

- *To Third Parties Performing Processing and Other Specialized Services:* At times, PRE may use outside organizations to perform specialized services such as, but not limited to, legal and security audits, payment processing, data analysis, e-mail delivery. These service providers are only given the information needed to perform those services and they are bound contractually to protect the confidentiality, privacy and security of your information and to limit the use of your information to the service being provided.
- *To Third Parties for Certain Legal Reasons:* We advise you that we may disclose personal information to the government or other legal or regulatory authorities (i) if so ordered by a court of law or (ii) for other legal reasons, such as (a) to comply with legal process such as a search warrant, subpoena or court order; (b) to protect PRE's rights and/or property; (c) to investigate reports of fraud or of users sending material using a false email address or users sending harassing, threatening, or abusive messages; (d) to protect against what we believe in our sole and absolute discretion to be a misuse or unauthorized use of any PRE Services; or (e) in emergencies, such as when we believe our or our affiliate's integrity requires protection or someone's physical safety is at risk. In some cases, disclosure may be required by law to be without notice to you, including as noted above.
- *To a Third Party in the Event of a Significant Transaction or Other Event:* In the case of any significant transaction or event involving PRE or any of its related entities or divisions such as, by way of example, a sale, merger, amalgamation, financing, re-organization, liquidation, or insolvency, other parties to the transaction and their professional advisors may need to have access to PRE's customer lists and various databases as part of the due diligence process. In this event, PRE would only provide such access under terms of a strict confidentiality agreement. Also, upon completion of the transaction or event, your personal information would be transferred to PRE's successor-in-interest to be used only for the purposes for which it was collected.

3.4 We will not use or disclose customer or user personal information for any additional purpose unless we obtain consent to do so.

3.5 We will not sell, lease or rent customer or user lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use customer or user personal information to make a decision that directly affects the customer or user, we will retain that personal information for at least one year so that the customer or user has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain customer and user personal information only as long as necessary to fulfill the identified purposes, for a legitimate business purpose, for the security of PRE and the PRE Services or to protect users, the public or third parties and/or to comply with any legal requirements, including statutory retention periods and corporate best practices..

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that customer and user personal information is accurate and complete where it may be used to make a decision about the customer or user or disclosed to another organization.

5.2 Customers and Users may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the Privacy Officer identified below.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the

information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the customer' or user's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of customer and user personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that customer and user personal information is appropriately protected:
 - Physically securing offices where personal information is held;
 - The use of user IDs and passwords (where applicable);
 - The use firewalls and Secure Socket Layers for stored personal information;
 - Restricting employee access to personal information as appropriate (i.e., only those that need to know will have access and such access will require a password); and
 - Contractually requiring any service providers to provide comparable security measures.
- 6.3 We will use appropriate security measures when destroying customer's and user's personal information such as shredding documents and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Customers and Users Access to Personal Information

- 7.1 Customers and users have a right to access their personal information, subject to limited exceptions outlined in the relevant sections of PIPA and PIPEDA (as applicable).
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer identified below.
- 7.3 Upon request, we will also tell customers and users how we use their personal information and to whom it has been disclosed, if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the customer or user of the cost and request further direction from the customer or user on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the customer or user in writing, providing the reasons for refusal and the recourse available to the customer or user.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer

- 8.1 The Privacy Officer is responsible for ensuring PRE's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Customers and users should direct any complaints, concerns or questions regarding PRE's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, customer, member may also write to the Office of the Information and Privacy Commissioner for British Columbia or the Office of the Privacy Commissioner of Canada (as applicable).

Contact information for PRE's Privacy Officer:

Privacy Officer
PR Hockey Enterprises Inc.
c/o 300-1665 Ellis Street
Kelowna, BC V1Y 2B3

email: privacy@puckrecruiter.com

8.3 We may designate another individual other than the Privacy Officer as the person to contact for any requests related to this Privacy Policy by updating the contact information in policy 8.2.

Policy 9 – Changes

9.1 We may change our Privacy Policy from time to time and any such changes will be posted in this Privacy Policy. We will not reduce your rights under this Privacy Policy without your express consent.