

Privacy Statement

IDT Payment Services, Inc. and IDT Payment Services of New York LLC - Privacy Statement (United States)

OVERVIEW	WHAT PERSONAL INFORMATION DOES IDT PAYMENT SERVICES, INC. AND IDT PAYMENT SERVICES OF NEW YORK LLC COLLECT AND HOW DO THEY USE YOUR PERSONAL INFORMATION?
Why?	<p>IDT Payment Services, Inc. and IDT Payment Services of New York LLC (collectively, “IDT”) collect and share your personal information when you use our products and services, which may be offered under the brand names Boss Money, Elroy, Wallet by Boss Money, Awards2Go and/or BOSS Revolution Money Transfer. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Certain states also provide consumers with rights regarding the collection, sharing and selling of personal information. IDT is committed to protecting the privacy of our customers’ personal information. This Privacy Statement is designed to inform you of our policies and procedures regarding the collection and use of your personal information, and your options with regard to that collection and use. Please read this Privacy Statement carefully to understand what we do.</p> <p>Our primary goals in collecting information from you are to provide and improve our products and services, to administer your account, and to provide better targeted advertising. As used in this Privacy Statement, the terms “use,” “using” and “processing” information include subjecting the information to statistical or other analysis and using or handling information in any way, including but not limited to, scanning, collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.</p>
What?	<p>Depending on the product or service you use, you may provide personal information to us, we may automatically collect certain information, and/or we may obtain information from third party sources. The types of information we collect and share include without limitation:</p> <ul style="list-style-type: none">• the sender’s and beneficiary’s name, address, mobile and home telephone number, email address and back account number;• government identification numbers, such as driver’s license, state identification, passport, visa, Social Security number, tax identification number or foreign government identification;• account balances and transaction history;• credit, payment history and information from credit reporting agencies and other third parties; and• if you contact us or transact with us via a computer or mobile device, then computer and mobile device information such as the domain and host you use to access the Internet, your computer’s Internet address, the browser and operating system software you use, social profile and network information, the date and time you access our Websites, the Internet address used to link to our Website when you visit us, unique marketing IDs and other contact or lead information from third parties and location information. <p>We collect and use both personal identifying information and non-identifying information about you.</p>

	Personal information means information either on its own or in conjunction with other data that enables a specific person to be identified, but does not include “de-identified,” “anonymous,” or “aggregate” information, which is not associated with a specific person. “Non-identifying information” means information that by itself cannot be used to identify a specific person (e.g., zip code, location information and individual preferences). You consent to our collection, transfer and storage of information by computers or other transfer or storage devices in the United States and elsewhere.		
When?	This Privacy Statement was posted and last modified on July 1, 2024.		
How?	This Privacy Statement applies to users of our regulated products and services, whether purchased or registered through an authorized retailer, from one of our websites (www.bossrevolution.com or https://elroy.app) (collectively, the “Websites”) or through our Boss Money, Elroy and Boss Revolution Calling apps (collectively, the “Apps”). Our products and services may be offered under the brand names Boss Money, Elroy, Wallet by Boss Money, Awards2Go and/or BOSS Revolution Money Transfer. All financial companies need to share their customers’ personal information to run their everyday businesses. In the section below, we list the reasons why IDT shares its customers’ personal information and whether you can limit this sharing.		
Reasons why we share your personal information		Does IDT share?	Can you limit this sharing?
For our everyday business purposes including to: process your transactions; maintain your account(s); respond to court orders and legal investigations; report to credit bureaus; gather information about Website or App access, usage and performance; enhance your consumer experience; validate your creditworthiness or your identity; comply with Federal and State regulations; or as otherwise permitted or required by law		Yes	No
For our marketing purposes including to offer our products and services to you, or notify you about future events and promotions		Yes	Yes
For joint marketing with other financial companies including to offer you third party products and services that you might interested in		Yes	Yes
For our affiliates’ everyday business purposes including to: process your transactions; gather information about your transactions and experiences		Yes	No
For our affiliates’ everyday business purposes including to validate your creditworthiness		No	N/A (we don’t share)
For our affiliates to market to you including to deliver customized content and advertising to customers whose behavior indicates that they are interested in a particular subject area		Yes	Yes
For non-affiliates to market to you including sharing certain information about you for marketing, advertising or other purposes, including the delivery of advertising campaigns and preparing and sharing aggregate business and marketing reports		Yes	Yes

<p>General Sharing Info</p>	<p>We work with various service providers and vendors for a variety of business purposes such as to help us offer, operate, provide, improve, understand, customize, support and market our products and services. We share information with these vendors and partners to the extent reasonably necessary for them to perform work on our behalf. For example, we may provide your credit card information and billing address to our payment processing company solely for the purpose of processing payment for a transaction you have requested. In addition, IDT shares certain information, including unique marketing identifiers, email addresses and mobile phone numbers, with select service providers and vendors, including Google and Facebook, for marketing, advertising and analysis purposes, including the delivery of advertising campaigns and preparing and sharing aggregate business and marketing reports, demographic profiling and to deliver targeted advertising about products and services. When we share information with our service providers and vendors, we request that they protect your information and limit their use of the data to the purposes for which it was provided and not sell your information. IDT does not sell, rent or lease its customer lists to third parties.</p> <p>IDT has relationships with certain service providers in order to provide our services to you. For users of our Elroy branded service IDT has contracted with Synapse Financial Technologies, Inc. (“Synapse”), a backend technology service provider that owns or otherwise has relationships with (a) Synapse Brokerage LLC, an SEC-registered broker-dealer and member of FINRA and SIPC, (b) Synapse Credit LLC, a state-licensed lender, and (c) certain banks and financial institutions and service providers (each of the foregoing being a “Partner Financial Institution”). Among other services, Synapse performs “Know Your Customer” requirements and other requirements. For purposes of satisfying “Know Your Customer” requirements, IDT asks for your identifying information, such as your name, email address, tax identification number, address, telephone number, date of birth, videos, and photographs that may contain images of your face, including your driver’s license or government-issued identification number or card. IDT will also collect information pertaining to your account transactions. Your personal information will be shared with Synapse and will be subject to the Synapse Privacy Policy. Synapse will share your information as necessary with its Partner Financial Institutions and other service providers in connection with providing their services. The privacy policies of Synapse, its affiliates and its Partner Financial Institutions can be found here.</p>
<p>To Limit our Sharing of your Personal Information:</p>	<p>U.S. CONSUMERS (EXCEPT FOR VERMONT OR CALIFORNIA CONSUMERS – SEE BELOW)</p> <p>If you prefer that we limit how we share your information as described above, you may opt out of certain sharing as follows:</p> <ul style="list-style-type: none"> • Call 1-800-618-3172 • Mail to: <p style="margin-left: 40px;">IDT Payment Services, Inc. IDT Payment Services of New York LLC 520 Broad Street Newark, NJ 07102</p> <p>VERMONT AND CALIFORNIA CONSUMERS: IDT will disclose information about consumers with a Vermont or California mailing address only with your written authorization, unless otherwise permitted or required by law. Written authorizations from Vermont consumers may be delivered to us at the address above or by email at compliance@idt.net and must contain your name, address and signature and your consent. You may revoke your consent at any time by calling us at 1-800-618-3172, or by writing or emailing us at the addresses provided above. California consumers should contact us at the addresses above for instructions on how to deliver their consent. California consumers have certain other rights – see Other Important Information/California Consumers.</p>

	Limited Right Note: Certain sharing of personal information is not subject to an opt-out choice, including: sharing necessary to effect, administer or enforce a transaction you request; sharing with our authorized service providers (including IDT’s agents); sharing or disclosures permitted or required by law; and sharing to prevent fraud or other illegal activities.	
	Note for Former Customers: When you are no longer an IDT customer, we can continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.	
	You may also contact us at any time to review and request changes to any of your personal information.	
Questions?	Call 1-800-618-3172	
Who we are		
Who is providing this notice?		IDT Payment Services, Inc. IDT Payment Services of New York LLC
What we do		
How does IDT protect my personal information?	To help protect your personal information from unauthorized access and use, we endeavor to use reasonable security measures. These measures include physical, electronic and procedural safeguards such as computer safeguards and secured files and buildings. We also endeavor to limit personal information access to only employees, agents and representatives that need to know. Employees are trained on the importance of protecting privacy and on the proper access to, use and disclosure of customer information. Although we work hard to protect your personal information that we collect and store, no program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information. By using our products and services you accept that risk. IDT maintains security and incident response plans to handle incidents involving unauthorized access to personal information we collect or store. If we are required by law to inform you of a breach to your personal information, then we may notify you electronically, in writing, or by telephone, if permitted to do so by law. If you become aware of a security issue, please contact us.	
How does IDT collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none">• send or receive money, complete a payment or use or request other products or services from us;• register with us, submit information to us on applications or forms or otherwise give us your contact information;• provide us with your government issued ID;• use your credit card, debit card, charge card or bank account to make payment;• use our Apps or visit our Websites (for example, to complete a transaction, manage your accounts, or provide your choices) either from a computer or mobile device; or• enter a promotion. <p>We also collect information about you from a variety of sources, including without limitation, computer systems, third party sources such as our business clients, government agencies, and other suppliers of information; and consumer reporting agencies.</p>	

Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness; • affiliates from using your information to market to you; and • sharing for non-affiliates to market to you. <p>State laws and individual companies may give you additional rights to limit sharing. For details, see the "To Limit our Sharing of your Personal Information" section and the "Other Important Information" section.</p>
Definitions	
Affiliates	Companies related to IDT by common ownership or control. Affiliates can be financial and nonfinancial companies, and can be located in or outside the United States.
Non affiliates	Companies not related to IDT by common ownership or control. Non-affiliates can be financial or nonfinancial companies. For example, we may disclose information about current and former consumers and customers to non-affiliates, including without limitation: financial service providers that offer our services; banks, credit card companies, brokerage houses, mortgage lenders, mortgage originators and other financial companies, including for Joint Marketing purposes; non-financial companies such as retailers, direct marketers, auto dealers, utility companies, membership clubs and other providers of goods and services; government agencies; and otherwise as permitted or required by law. We may also disclose information to companies that perform marketing services for us or other financial institutions with whom we have Joint Marketing arrangements.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.
Other Important Information	
APP AND ONLINE ACTIVITIES	We do not honor any Web browser "do not track" signals or other mechanisms that provide you the ability to exercise choice regarding the collection of personally identifiable information about your online activities over time and across other websites or online services. In addition, other parties may collect personally identifiable information about your online activities over time and across different websites when you use our Websites or any of our services. We engage certain service providers and vendors who use mobile software development kits ("SDKs") to passively collect information from our users of the Apps. This information may include your e-mail address, and depending on the permissions granted to by you on your mobile device, your precise location (i.e., GPS-level data; see next section), apps you have installed and enabled, and your mobile identifier. We use this data to help us deliver personalized notifications and to identify you in a unique manner across other devices or browsers for the purposes of customizing advertisements or content. Our Websites and Apps may use certain web technologies such as "cookies" or "web beacons." We use cookies, small text files stored locally on your computer or device to serve as markers, to operate, provide, improve and customize our services and your experiences. For example, we use cookies to understand which of our FAQs are most popular and to show you relevant content related to our services. Additionally, we may use cookies to remember your choices, such as your language preferences. Web beacons are used to tell us how and when pages in our sites are visited, by how many people, their point of origin and operating system and to monitor performance with our services. These technologies do not collect personal information.
LOCATION DATA	We may collect and share your precise location information through methods such as SDKs. We use X-Mode Social, Inc. ("X-Mode") to collect and pass onto select service providers and vendors your precise location information (such as your device GPS coordinates) or relative location

	<p>information (for example, from WiFi signals or Bluetooth Low Energy devices in your proximity) linked to your mobile device or advertising identifiers and may do so when you use the Apps or when the Apps run in the background on your device. That information may be used by our service providers and vendors to customize ads in the Apps or in other apps. The information may also be used for market or other research regarding aggregated traffic patterns. X-Mode automatically collects usage information that does not identify an individual user (“Usage Data”). For example, when you use our products and services on a mobile device, X-Mode may automatically collect information such as your device type, operating system version and type, certain device settings, device time zone, device carrier, current IP address, and platform-specific advertising identifiers. X-Mode uses this information to enhance the services we offer, provide targeted advertising, and to help us understand how people use our products and services. Aggregated device data, including location and Usage Data, is also measured for the purposes of targeted advertising and market research by X-Mode. For further information, please see <u>X-Mode’s Privacy Policy</u>. If you do not want this information to be linked to your device, you may go to your device settings and opt out of interest-based or personalized advertising (iOS: Settings → General → Privacy → Advertising → Limit Ad-Tracking; Android: Settings → Google → Ads → Opt out of Ads Personalization). You may also prevent location from being collected by this or other apps through your location permission settings.</p>
CHILDREN'S PRIVACY	<p>Our Websites are not directed at children under the age of 16. IDT does not knowingly collect or maintain information at our Websites from persons under the age of 16.</p>
THIRD PARTY WEBSITES	<p>This Privacy Statement does not apply to any website, product, or service of any third-party companies, advertisers, partners, or service providers, even if the website links to (or is linked from) our Websites and/or Apps. Our Websites and Apps may contain links to other third-party websites not owned, operated, maintained by or related to IDT (“<u>Third-Party Sites</u>”). Any such hyperlinks are to be accessed at the user’s own risk. We are not responsible for the content, privacy practices, data collection, policies, or any other aspect of a Third-Party Site, even if our Websites or Apps contain a link to such site. This Privacy Statement does not apply to Third Party Sites, and we encourage you to independently read and understand each Third-Party Site’s own privacy policies. The presence of a link to a Third-Party Site does not necessarily indicate that such Third-Party Site is sponsored by or affiliated with IDT in any way</p>
NEVADA CONSUMERS	<p>This notice is provided to you pursuant to state law. Nevada state privacy laws permit us to make marketing calls to existing customers, but if you prefer not to receive marketing calls, you may be placed on our internal opt-out list by calling us at 1-800-618-3172 or you may also contact the Nevada Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Ste. 3900, Las Vegas, NV 89101; telephone 702-486-3132; email: <u>BCPINFO@ag.state.nv.us</u>.</p>
TEXAS CONSUMERS	<p>If you have a complaint, first contact our compliance department at 1-800-618-3172 or by writing or emailing us at the mailing or email addresses noted above. If you still have an unresolved complaint regarding the company's money transmission or currency exchange activity, please direct your complaint to: Texas Department of Banking, 2601 North Lamar Boulevard, Austin, Texas 78705, 1-877-276-5554 (toll free), <u>www.dob.texas.gov</u>.</p>

CALIFORNIA CONSUMERS	<p>1. Personal Information - personal information includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include publicly available information, including information lawfully made available to the general public by the consumer or from widely distributed media, and deidentified or aggregate consumer information. The categories of personal information regarding California residents that IDT may collect and use are listed in <u>Appendix A</u> attached to this notice.</p> <p>2. Rights - as a California resident you have certain additional rights regarding your personal information under the California Consumer Privacy Act of 2018 and (starting on January 1, 2023) the California Privacy Rights Act of 2020 (collectively, the “<u>CCPA</u>”).</p> <p>A. Right to Know and Access Personal Information Collected – you have the right to request the following from IDT: categories of personal information collected; categories of sources of personal information; business or commercial purpose for collecting, selling or sharing your personal information; categories of third parties with whom we disclose your personal information; and the specific pieces of personal information that we have collected about you.</p> <p>B. Right to Know Personal Information Sold, Shared or Disclosed – you have the right to request the following from IDT: categories of personal information collected; categories of personal information sold or shared by IDT; categories of third parties to whom IDT has sold or shared your personal information; categories of personal information IDT has disclosed for a business purpose; and categories of persons to whom IDT has disclosed your personal information for a business purpose.</p> <p>C. Right of No Retaliation - IDT does not discriminate against any California consumer who exercises any of the consumer’s rights under the CCPA. Pursuant to the CCPA IDT is permitted to (a) charge a consumer a different price or rate and/or provide a different level of service to the consumer if that difference is reasonably related to the value provided to the consumer by the consumer’s data, (b) offer loyalty, rewards, premium features, discounts, or club card programs to its customers, and (c) offer financial incentives, including payments, as compensation for the collection, sale, sharing or retention of personal information.</p> <p>D. Right to Delete – you have the right to request that IDT delete any personal information that it has collected about you. There are exceptions to this right and IDT does not have to delete your personal information if it is reasonably necessary to complete a transaction with you, to provide you with goods or services you requested, to comply with our legal obligations, and as otherwise provided in the CCPA. In addition, if your personal information is deleted you may not be able to purchase or use our products and services.</p> <p>E. Right to Correct Inaccurate Personal Information – you have the right to request that IDT correct any inaccurate personal information that it maintains about you.</p> <p>F. Right to Opt Out of Sale or Sharing of Personal Information – IDT does not sell (as defined in the CCPA) or share (as defined in the CCPA) your personal information. Nonetheless, you have the right to request that IDT not sell or share your personal information should IDT decide in the future to sell or share personal information to third parties. To exercise this right please go to https://www.idt.net/ccpa-do-not-sell and complete the form. We will also process any opt-out of sale/sharing preference signal that meets the requirements set forth in the CCPA and its regulations. IDT does not intentionally collect the personal information of a consumer under the age of 16. IDT does not intentionally sell or share the personal information of a consumer under the age of 16 unless the consumer (if age 13-16) or the consumer’s parent (for consumers under 13) affirmatively authorizes the sale or sharing.</p> <p>G. Right to Limit Use and Disclosure of Sensitive Personal Information – IDT does not use</p>
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your sensitive personal information (as defined in the CCPA) for purposes other than as set forth in the CCPA. Nonetheless, you have the right to direct IDT to limit its use of your sensitive personal information to that use which is necessary for IDT to perform the services and provide the goods you requested from IDT, to ensure the security and integrity of your personal information, to perform services on our behalf, including to maintain or service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide analytic services, to maintain the quality of our products and services, and as otherwise provided in the CCPA. Please note that sensitive personal information that is collected or processed by IDT without the purpose of inferring characteristics about a consumer, is not subject to this section, and shall be treated as personal information. To exercise this right please go to <https://www.idt.net/ccpa-do-not-sell> and complete the form.

3. How to Exercise Your Rights - to exercise your rights to know and access your personal information collected, sold, shared or disclosed by IDT, or to exercise your right to delete your personal information or to correct inaccurate personal information, please go to <https://www.idt.net/ccpa-request> and complete the form. To exercise your right to opt out of the sale or sharing of your personal information, or to exercise your right to limit the use and disclosure of your sensitive personal information please go to <https://www.idt.net/ccpa-do-not-sell> and complete the form. We will also process any opt-out of sale/sharing preference signal that meets the requirements set forth in the CCPA and its regulations. In addition, you can exercise your rights by calling the following toll-free number: 888-412-0477. Your authorized agent can make these requests on your behalf using the same links and methods.

4. Verification of Consumer Requests - in order to comply with a consumer request, IDT must reasonably verify the requestor. A record of each request is made as soon as it is received by our data protection team. IDT will use all reasonable measures to verify the identity of the individual making the request. We will utilize the requested data to ensure that we can verify the requestor's identity and where we are unable to do so, we may contact you for further information, or ask you to provide evidence of your identity prior to responding to your request. This is to protect your data and rights. If a third party, relative or representative is requesting the data on your behalf, we will verify their authority to act for you and may contact you and them to confirm you and their identity and gain your authorization prior to responding to the request.

5. Responding to Consumer Requests - IDT will attempt to confirm receipt of each request by contacting the requestor either at the email or telephone number submitted, through the consumer's account or by other electronic means. IDT will attempt to verify each request and if it is able to verify a request will provide a response (if necessary and applicable) within 45 days of the receipt of the request, which time period may be extended by IDT for an additional 45 days. If a delay is necessary, IDT will contact the requestor within the original 45 day period and provide the reasons for the delay. IDT may charge a fee or refuse to act on any request that is manifestly unfounded or excessive. All IDT responses shall be in writing and cover the previous 12 month period unless the consumer requests information beyond the 12 month period (only applies to personal information collected on or after January 1, 2022). Where possible the response shall be sent through the consumer's account. Otherwise, the response shall be sent by mail or electronically. IDT is not obligated to provide a response to a consumer more than two times in any 12 month period. The CCPA contains certain exemptions and exceptions to the exercise of some of these rights. If one or more of those exemptions or exceptions applies to your request, then we may not be able to act upon your request. Where possible we will inform you of the reasons for not acting upon your request.

6. How Long will IDT Retain Your Personal Information - IDT retains your personal information for only as long as is necessary to carry out the purposes described above in this privacy policy, and we have strict review and retention policies in place to meet these obligations. This time period may vary depending on the type of information and the services used, as detailed below,

	<p>and applicable law, which may require us to maintain information for a set amount of time. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from anonymized information retained or used for these purposes.</p> <p>(a) Customer account information. We store your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate your service. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our services. We are required under certain applicable tax laws to keep your basic personal information (name, address, contact details) for a minimum of six years after which time it will be destroyed unless required to be kept for other purposes.</p> <p>(b) Communications usage information. While you are an active customer, we retain the communications usage information generated by your use of our services until the information is no longer necessary to provide our services, and for a reasonable time thereafter as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our services.</p> <p>(c) Marketing information, cookies and web beacons. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.</p> <p>(d) Device information. We collect device-specific information from you. If you do not revoke our access to this information via the privacy settings on your device, we will retain this information for as long as your account is active.</p> <p>7. Exemptions - the CCPA does not apply to personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102), and its implementing regulations. Accordingly, personal information that is obtained in connection with certain services provided by IDT, including money transfer and bill payment, is exempt from the CCPA.</p> <p>8. For More Info - for more information on your rights and our obligations under the CCPA please send an email to ccpa@idt.net. For California residents with a disability please send an email to ccpa@idt.net for information on how to access this policy in another format.</p>
CHANGES	<p>We reserve the right to modify this Privacy Statement and you are advised to review it periodically for changes. You can receive an updated Privacy Statement by calling us at 1-800-618-3172 or by visiting our Websites at www.bossrevolution.com/moneytransfer and https://elroy.app.</p>

Appendix A

California Consumers

A. The Categories of Personal Information regarding California Consumers that IDT May Collect and Use

Categories of Personal Information Collected	Specific Personal Information Collected within Category	Categories of Sources of Personal Information	Is this info Sold, Shared ⁽¹⁾ and/or Disclosed for a Business Purpose and Categories of to Whom	Business or Commercial Purposes for Collection and Use of Personal Information
Personal Identifiers and Information, including items listed in subdivision (e) of Section 1798.80 of California Civil Code	name, address, email address, phone number, birthdate, device and marketing identifiers, IP address, payment and financial information, credit/debit card number and details, bank account number and information, personal information necessary to verify you or your account, security code and login credentials, and other personal information you provide	consumer, consumer's device, automatic collection by IDT, credit reporting companies, financial companies, 3 rd party vendors that provide IDT with transactional services, data resellers	<p>Sold – no</p> <p>Shared – no</p> <p>Disclosed for a Business Purpose – yes</p> <p>Categories of third parties to whom IDT discloses personal information for a business purpose: IDT family of companies, including our affiliates both in and outside the United States; our service providers and vendors to the extent reasonably necessary for them to perform work on our and your behalf (e.g., credit card processors); ad networks; data analytics providers; social networks; law enforcement; prospective purchasers of our business; outside auditors and lawyers; and government entities, agencies and regulators</p>	<p>To manage our products and services, including to help us operate, provide, evaluate, improve, monitor, customize, bill and support our products and services</p> <p>To maintain the quality of our products and services, including to improve, upgrade, and enhance our products and services</p> <p>To maintain and service your account, including to process orders and payments</p> <p>To communicate with you about our terms and policies</p> <p>To verify you, your account activity and your information</p> <p>To detect, investigate and report fraud, abuse or illegal use of our products and services or customer accounts</p> <p>To provide customer service</p>
Commercial information	records of products or services purchased and used, diagnostic and service performance information, call records and other traffic data, credit information from reporting agencies, transactional	consumer, consumer's device, automatic collection by IDT, credit reporting companies, financial companies, 3 rd party vendors that	<p>Sold – no</p> <p>Shared – no</p> <p>Disclosed for a Business Purpose – yes</p>	<p>To perform due diligence, credit and fraud prevention checks</p> <p>To maintain accurate record keeping</p> <p>To ensure security and</p>

	information, and other purchasing or consuming histories or tendencies	provide IDT with transactional services, data resellers	Categories of third parties to whom IDT discloses personal information for a business purpose: see list under Personal Identifiers and Information	integrity of our customers' personal information To perform product, marketing and organizational analysis To provide advertising and marketing to our customers
Internet or other electronic network activity information	browsing history, search history, messages, personal, phone or social network contact information, device information, device contacts, and information regarding a consumer's interaction and usage with our websites, apps and advertisements	consumer, consumer's device, automatic collection by IDT, credit reporting companies, financial companies, 3 rd party vendors that provide IDT with transactional services, data resellers	Sold – no Shared – no Disclosed for a Business Purpose – yes Categories of third parties to whom IDT discloses personal information for a business purpose: see list under Personal Identifiers and Information	To measure our marketing campaigns and to audit consumer interactions To comply with regulations and legal requirements To comply with contractual requirements For risk management and compliance For legal advice and defense of claims
Geolocation data (if use location features)	location of device	consumer, consumer's device, automatic collection by IDT	Sold – no Shared – no Disclosed for a Business Purpose – yes Categories of third parties to whom IDT discloses personal information for a business purpose: see list under Personal Identifiers and Information	For general, operational and administrative purposes
Inferences drawn from any of the information above	profile reflecting the consumer's marketing preferences; aggregate information from third parties	consumer, consumer's device, automatic collection by IDT, credit reporting companies, financial companies, 3 rd party vendors that provide IDT with transactional services, data resellers	Sold – no Shared – no Disclosed for a Business Purpose – yes Categories of third parties to whom IDT discloses personal information for a business purpose: IDT family of companies, including our affiliates both in and outside the United States; our vendors and partners to the extent reasonably necessary for them to perform work on our and your behalf (e.g., credit	

			card processors); ad networks; data analytics providers; social networks; and prospective purchasers of our business	
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(1) Share and Shared mean sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.

B. The Categories of Sensitive Personal Information regarding California Consumers that IDT May Collect and Use

IDT may collect limited sensitive personal information and limits the use of that information to those uses which are necessary for us to perform the services and provide the goods consumers have requested and for other uses as authorized by applicable California privacy laws and regulations. IDT may collect and use the following sensitive personal information:

Categories of Sensitive Personal Information Collected	Is this info Sold or Shared ⁽¹⁾	Business or Commercial Purposes for Collection and Use of Sensitive Personal Information
(A) account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (B) precise geolocation (if use location features)	Sold – no Shared – no	To perform the services and provide the goods requested by the consumer, including to help us operate, provide, customize, bill and support our products and services To ensure the security and integrity of our customers' personal information, including to prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information For short-term, transient use, including but not limited to non-personalized advertising shown as part of a consumer's current interaction with IDT To perform services on our behalf, including to maintain or service accounts, provide customer service, process or fulfill orders and transactions, verify customer information, process payments, provide financing, provide analytic services, provide storage, or provide similar services on behalf of our business To maintain the quality and safety of our products and services, including to improve, upgrade, and enhance our products and services To resist malicious, deceptive, fraudulent, or illegal actions directed at our business and to prosecute those responsible for those actions To ensure the physical safety of natural persons

(1) Share and Shared mean sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.