

# Privacy Statement

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

<b>OVERVIEW</b>	<b>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?</b>
<b>Why?</b>	<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. 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>
<b>What?</b>	<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"> <li>• the sender’s and beneficiary’s name, address, mobile and home telephone number, email address and back account number;</li> <li>• government identification numbers, such as driver’s license, state identification, passport, visa, Social Security number, tax identification number or foreign government identification;</li> <li>• account balances and transaction history;</li> <li>• credit, payment history and information from credit reporting agencies and other third parties; and</li> <li>• 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 website, 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.</li> </ul> <p>We collect and use both personal information and non-identifying information about you. 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”</p>

	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.		
<b>When?</b>	This Privacy Statement was posted and last modified on January 30, 2020.		
<b>How?</b>	This Privacy Statement applies to users of our regulated products and services, whether purchased or registered through an authorized retailer, from our website ( <a href="http://www.bossrevolution.com">www.bossrevolution.com</a> ) or through our Boss Revolution Money Transfer Application (the “App”). 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.		
<b>Reasons why we share your personal information</b>		<b>Does IDT share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> 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
<b>For our marketing purposes</b> including to offer our products and services to you, or notify you about future events and promotions		Yes	Yes
<b>For joint marketing with other financial companies</b> including to offer you third party products and services that you might interested in		Yes	Yes
<b>For our affiliates’ everyday business purposes</b> including to: process your transactions; gather information about your transactions and experiences		Yes	No
<b>For our affiliates’ everyday business purposes</b> including to validate your creditworthiness		No	N/A (we don’t share)
<b>For our affiliates to market to you</b> including to deliver customized content and advertising to customers whose behavior indicates that they are interested in a particular subject area		Yes	Yes
<b>For non-affiliates to market to you</b> 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
<b>General Sharing Info</b>	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.

**To Limit our Sharing of your Personal Information:**

**U.S CONSUMERS (EXCEPT FOR VERMONT OR CALIFORNIA CONSUMERS – SEE BELOW)**

If you prefer that we limit how we share your information as described above, you may opt out of certain sharing as follows:

- **Call 1-800-618-3172**
- **Mail to:**  
**IDT Payment Services, Inc.**  
**IDT Payment Services of New York LLC**  
**520 Broad Street**  
**Newark, NJ 07102**

**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](mailto: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.

**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**

<b>Who is providing this notice?</b>	IDT Payment Services, Inc. IDT Payment Services of New York LLC
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**What we do**

<p><b>How does IDT protect my personal information?</b></p>	<p>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. IDT maintains security and incident response plans to handle incidents involving unauthorized access to private information we collect or store. If you become aware of a security issue, please contact us.</p>
<p><b>How does IDT collect my personal information?</b></p>	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>• send or receive money, complete a payment or use or request other products or services from us;</li> <li>• register with us, submit information to us on applications or forms or otherwise give us your contact information;</li> <li>• provide us with your government issued ID;</li> <li>• use your credit card, debit card, charge card or bank account to make payment;</li> <li>• use our App or visit our online websites (for example, to complete a transaction, manage your accounts, or provide your choices) either from a computer or mobile device; or</li> <li>• enter a promotion.</li> </ul> <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>
<p><b>Why can't I limit all sharing?</b></p>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness;</li> <li>• affiliates from using your information to market to you; and</li> <li>• sharing for non-affiliates to market to you.</li> </ul> <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>
<p><b>Definitions</b></p>	
<p>Affiliates</p>	<p>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.</p>
<p>Non affiliates</p>	<p>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,</p>

	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.
<b>Other Important Information</b>	
<b>APP AND ONLINE ACTIVITIES</b>	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 website 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 App. 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.
<b>LOCATION DATA</b>	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 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 App or when the App runs in the background on your device. That information may be used by our service providers and vendors to customize ads in the App 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 <a href="#">X-Mode's Privacy Policy</a> . 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.
<b>CHILDREN'S PRIVACY</b>	Our website is not directed at children under the age of 16. IDT does not knowingly collect or maintain information at our website from persons under the age of 16.
<b>EXTERNAL WEBSITES</b>	Our website may be linked to or from third party websites. IDT is not responsible for the content or privacy practices of websites that are linked to or from our website.
<b>NEVADA CONSUMERS</b>	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: <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a> .

<p><b>TEXAS CONSUMERS</b></p>	<p>If you have a complaint, first contact our compliance department at <b>1-800-618-3172</b> 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), <a href="http://www.dob.texas.gov">www.dob.texas.gov</a>.</p>
<p><b>CALIFORNIA CONSUMERS</b></p>	<p>1. 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. The categories of personal information regarding California residents that IDT collects and shares are listed in <u>Appendix A</u> attached to this notice.</p> <p>2. California consumers have certain additional rights regarding their personal information under the California Consumer Privacy Act of 2018 (“<u>CCPA</u>”).</p> <p>A. Right to Know 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 or selling your personal information; categories of third parties with whom we share 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 or Disclosed – you have the right to request the following from IDT: categories of personal information collected; categories of personal information sold by IDT; categories of third parties to whom IDT has sold your personal information; and categories of personal information IDT has disclosed for a business purpose.</p> <p>C. Right of No Discrimination - 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 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.</p> <p>D. Right of Deletion/Erasure – 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 including if necessary to complete a transaction, to provide you with services, to detect fraud, to comply with our legal obligations, and to use internally in a lawful manner compatible with the context in which the personal information was given. 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 Not Sell Personal Information – IDT does not sell your personal information to third parties. Nonetheless, you have the right to request that IDT not sell your personal information should IDT decide in the future to sell personal information to third parties. To exercise this right please go to <a href="https://www.idt.net/ccpa-do-not-sell">https://www.idt.net/ccpa-do-not-sell</a> and complete the form. IDT does not intentionally collect the personal information of a consumer under the age of 16. IDT does not intentionally sell 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.</p> <p>3. To exercise your rights to know personal information collected, sold or disclosed, or to exercise your right to delete your personal information, please go to <a href="https://www.idt.net/ccpa-request">https://www.idt.net/ccpa-request</a> and complete the form. To exercise your right to opt out of the sale of your personal information please go to <a href="https://www.idt.net/ccpa-do-not-sell">https://www.idt.net/ccpa-do-not-sell</a> and complete the form. In addition, you can exercise your rights by calling the following toll-free number: 888-412-0477.</p> <p>4. 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</p>

	<p>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.</p> <p>5. 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. If a request is particularly complex, IDT may take an additional 90 days to respond. 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. 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 from the right of deletion and/or the provision of personal information. 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.</p> <p>6. For More Info. For more information on your rights and our obligations under the CCPA please send an email to <a href="mailto:ccpa@idt.net">ccpa@idt.net</a>. For California residents with a disability please send an email to <a href="mailto:ccpa@idt.net">ccpa@idt.net</a> for information on how to access this policy in another format.</p>
<b>CHANGES</b>	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 <b>1-800-618-3172</b> or by visiting our website at <a href="http://www.bossrevolution.com/moneytransfer">www.bossrevolution.com/moneytransfer</a> .

California Consumers: The Categories of Personal Information regarding California Consumers that IDT Collects and Shares

Categories of Personal Information Collected	Specific Personal Information Collected within Category	Categories of Sources of Personal Information	Is this info Shared and/or Sold and Categories of to Whom	Business or Commercial Purposes for Collection and Sharing of Personal Information
Personal Identifiers and Information, including items listed in subdivision (e) of Section 1798.80 of	name, address, email address, phone number and bank account number (for sender and beneficiary); government	consumer, consumer's device, automatic collection by IDT, credit reporting	Shared – yes  Categories of third parties with whom IDT	To manage our products and services, including to help us operate, provide, evaluate, improve, monitor, customize, bill

California Civil Code	ID number; 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	companies, financial companies, 3 <sup>rd</sup> party vendors that provide IDT with transactional services, data resellers	shares personal information: 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; law enforcement; prospective purchasers of our business; outside auditors and lawyers; and government entities, agencies and regulators  Sold – no	and support our products and services  To maintain and service your account, including to process orders and payments  To communicate with you about our terms and policies  To verify you, your account activity and your information  To detect, investigate and report fraud, abuse or illegal use of our products and services or customer accounts  To provide customer service  To perform due diligence, credit and fraud prevention checks
Commercial information	records of products or services purchased and used; diagnostic and service performance information; credit and payment information from reporting agencies; transactional information; and other purchasing or consuming histories or tendencies	consumer, consumer’s device, automatic collection by IDT, credit reporting companies, financial companies, 3 <sup>rd</sup> party vendors that provide IDT with transactional services, data resellers	Shared – yes  Categories of third parties with whom IDT shares personal information: see list under Personal Identifiers and Information  Sold – no	To maintain accurate record keeping  To perform product, marketing and organizational analysis  To provide advertising and marketing to our customers  For joint marketing with other financial companies
Characteristics of protected classifications	age and citizenship status (indirectly from possible documents received from consumer)	consumer	Shared – yes  Categories of third parties with whom IDT shares personal information: see list under Personal Identifiers and Information  Sold – no	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
Internet or other electronic network activity information	browsing history, search history, device information, social network information, 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 <sup>rd</sup> party vendors that provide IDT with transactional services, data	Shared – yes  Categories of third parties with whom IDT shares personal information: see list under Personal Identifiers and Information  Sold – no	To report to credit bureaus  For legal advice and defense of claims  For general, operational and administrative purposes



<p>Geolocation data (if use location features)</p>	<p>location of device</p>	<p>resellers consumer, consumer's device, automatic collection by IDT</p>	<p>Shared – yes  Categories of third parties with whom IDT shares personal information: see list under Personal Identifiers and Information  Sold – no</p>	
<p>Inferences drawn from any of the information above</p>	<p>profile reflecting the consumer's marketing preferences; aggregate information from third parties</p>	<p>consumer, consumer's device, automatic collection by IDT, credit reporting companies, financial companies, 3<sup>rd</sup> party vendors that provide IDT with transactional services, data resellers</p>	<p>Shared – yes  Categories of third parties with whom IDT shares personal information: 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  Sold – no</p>	