

IDT Financial Services Limited

Prime™ Card Privacy Policy

Effective and Updated April 7, 2014

General

IDT Financial Services Limited and its affiliates (“IDT”, “us”, “we”, “our”) are committed to protecting the privacy of our customers’ personal information. Our Prime Card Privacy Policy together with the “Use of Your Information” section of our [Terms & Conditions](#) are designed to inform you about the information we collect, how we use and share it, and your options with regard to that collection and use. As we may periodically update our Privacy Policy, you should review it often for changes. This Privacy Policy applies to:

- our Prime Card customers within Europe;
- visitors and users of www.idtprime.com, any other Prime Card website and any Prime Card mobile application (collectively, the “[Prime Websites](#)”); and
- the products and services on the Prime Websites.

Information We Collect and How We Use It

We collect and use information about you in the following ways. Personal information means information that, either on its own or in conjunction with other data, enables a specific person to be identified, but does not include “de-identified,” “anonymous,” or “aggregate” information, which cannot be associated with a specific person.

1. Information Collected When You Communicate with IDT

When you communicate with us, we may collect the following personal information:

- your name, address, mobile phone number, email address, birthdate, and other personal, phone or social network contact information;
- the reason for your contact; and/or
- your credit card details and other payment information.

We use this information to provide, confirm, change, bill, monitor, maintain and repair your Prime Card products and services. We also use this information to resolve any issues with your order, with our products and services, or with your account. Finally, we use this information to establish and maintain your Prime Card account, authenticate you, and contact you about products and services that we offer.

When you contact us or we contact you, we may monitor or record that communication to help us train employees and provide high-quality customer service or for legal or regulatory purposes.

2. Information Collected When You Use Prime Card Products and Services

We collect information about you when you use our Prime Card products, services, and the Prime Websites. This information includes:

- websites visited and application and feature usage;
- product and device-specific information, including data relating to usage of your Prime Card;
- mobile and device numbers; and/or
- information about your phone, system and application software.

We use this information for billing purposes, to facilitate, deliver and maintain products and services, customise data presented to you and to help you with service-related issues or questions. We may also use this information for other purposes such as: providing you with information about product or service enhancements, determining your eligibility for new products and services, and marketing to you based on your use of our products and services; managing and protecting our networks, services and users from fraudulent, abusive, or unlawful uses; and subject to consent practices described in this policy, helping us improve our services, researching and developing new products, and offering promotions and other services. We may aggregate this type of information in a manner that does not personally identify you for business and marketing uses by us or by third parties.

3. Information Provided to Us by Third Parties

When you purchase Prime Card products or services, we may obtain credit information about you from outside credit reporting agencies to help us with customer authentication and credit-related decisions.

IDT also obtains aggregated and anonymised information from outside companies that collect consumer information such as demographic and interest data. Examples of this information include gender, age range, sports enthusiast, or pet owner. We use this data and combine it with other information we have about you to help us predict customer preferences and to direct marketing offers that might be more relevant to you.

We may also obtain contact information and other marketing lead information from third parties, and may combine it with information we have to contact you or direct IDT's marketing offers to you. Website visitors and others may provide us with your email address or mobile phone number through "refer-a-friend" options or social networking platforms. We use these email addresses and mobile phone numbers to send promotional offers, free trials, Prime Card products and services purchased by others for your use and IDT promotional marketing information, all in accordance with applicable law. For details on how to stop receiving marketing information, please see the section below "How to Limit the Sharing and Use of Your Information".

4. Information Collected on Prime Websites

When you use and browse the Prime Websites, we collect information about your device and your visit, including:

- your browsing, searching and buying activity;
- your IP address;
- web addresses of the sites you come from and go to next; and/or
- information about your connection, including your device's browser, operating system, platform type and Internet connection speed.

We use this information for operational and performance measurement purposes including monitoring statistics such as how many people visit our websites, which pages people visit on our sites, how much time is spent on each page, or which browsers are used to visit our sites. We also may provide statistical "ratings" information (not personal information) to our website partners about how our members, collectively, use the Prime Websites.

When you establish an online account with us, we maintain information about your user identification, security code and password. This information is used to identify you when you sign in to your account.

5. Cookies and Other Similar Technologies

The Prime Websites may use certain web technologies such as "cookies" or "web beacons". Web beacons are used to tell us how and when pages in our site are visited, by how many people and their point of origin and operating system and to monitor performance of our websites. These do not collect personally identifiable information and we do not combine information collected through these technologies with other personal information.

We also use cookies (which are small text files stored locally on your computer or device to serve as markers). These include Prime Card cookies and third party analytical cookies. Below is a summary of the cookies we use and why:

Strictly necessary cookies. These cookies are required for the operation of the Prime Websites and include, for example, cookies that enable you to log into secure areas of the Prime Websites.

Analytical/performance cookies. These allow us to recognise and count the number of visitors, see which sites visitors have come from and how they move around the Prime Websites when they are using it. These help us to improve the way Prime Websites work, for example, by ensuring that users are finding what they are looking for easily. These cookies collect information in an anonymous form. We use this information to compile reports and to help us improve the Prime Websites.

Functionality cookies. These cookies are used to recognise you when you return to the Prime Websites. They enable us protect and authenticate access, to personalise our content for you, greet you by name, remember your preferences, make recommendations and complete transactions you request.

Targeting cookies. These cookies record your visit to the Prime Websites, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We will not share this information with any third parties for this purpose.

Cookie Provider	Cookie Type(s)
Prime Card	Strictly necessary cookies; Functionality cookies; Targeting cookies.
Third Parties	Analytical / performance cookies.

In most cases, computers' Internet browsers enable you to erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please note that disabling cookies may prevent you from using specific features on the Prime Websites and other websites, such as ordering products or services and maintaining an online account

By using the Prime Websites you are consenting to our use of cookies.

6. Information You Provide

When you contact us for information about Prime Card products, services or promotions, we may collect information from you such as:

- personal contact and billing information;
- email address or phone number;
- credit information; and/or
- other information you provide to us.

If you enter a promotion or sweepstake, your information may be disclosed as part of the program's administration, such as in connection with the publication of winners, prize fulfillment, and as required by law or permitted by the promotion's official rules. We may also collect information from you when you agree to participate in surveys or provide other feedback to us regarding our products or services. We use this information only for the purposes disclosed to you at the time you provide it.

When you open an IDT email or SMS message or click on links within these emails or text messages, we may collect and retain information to provide you with future communications that may be of interest to you. Please note that IDT will not ask you to send us via email any sensitive personal information or account information.

How We Share Information

We share your information in the following ways.

1. Information Shared Within the IDT Telecom Family of Companies

IDT shares customer information within the IDT Telecom, Inc. family of companies (“IDT Family of Companies”) for operational purposes, our own marketing purposes and for general administration purposes. Sharing this information allows us to provide you with the latest information about the IDT Family of Companies’ products and services and to offer you our latest promotions.

2. Information Shared Outside the IDT Family of Companies

IDT does not sell, license or share information that individually identifies our customers, people using our networks, or website visitors with others outside the IDT Family of Companies for non-IDT purposes without the consent of the person whose information will be shared, except as explained in this Privacy Policy.

IDT does not sell, rent or lease its customer lists to third parties. IDT does not publish directories of our customers’ phone numbers, and we do not provide or make them available to third parties for listing in directories without prior customer consent.

IDT uses vendors and partners for a variety of business purposes such as to help us offer, provide, operate, repair and bill for products and services we deliver to you. We share information with those 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. We require these vendors and partners protect any customer information we may provide to them and limit their use of IDT customer data to the purposes for which it was provided.

IDT also may share certain de-identified information with third parties for marketing, advertising or other purposes, including the delivery of advertising campaigns and preparing and sharing aggregate business and marketing reports.

If you purchase products or services offered jointly by IDT and one of our partners, customer information may be received by both IDT and our partner that is providing the product or service. For these jointly offered products and services, you should also review the partner company’s privacy policy which may include practices that are different from the practices described here.

We may disclose information that individually identifies our customers or identifies customer devices in certain circumstances, such as:

- to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise permitted by law;
- in cases involving danger of death or serious physical injury to any person or other emergencies;
- to protect our rights or property, or the safety of our customers or employees;
- to protect against fraudulent, malicious, abusive, unauthorised or unlawful use of or subscription to our products and services and to protect our network, services, devices and users from such use;
- to advance or defend against complaints or legal claims in court, administrative proceedings and elsewhere;
- to credit bureaus or collection agencies for reporting purposes or to obtain payment for IDT-billed products and services;
- to a third-party that you have authorised to verify your account information;
- to outside auditors and regulators;
- to prospective purchasers of all or part of IDT's business or assets; or
- with your consent.

3. Information Provided to or Used by Third-Party Advertising Entities or Social Networks

You may see third-party advertisements on the Prime Websites, products or services. Some advertisements are chosen by companies that place advertisements on behalf of other third-party advertisers. These companies, often called ad servers, may place and access cookies on your device to collect information about your visit on our websites. The information they collect from our sites is in a form that does not identify you personally. This information may be combined with similar data obtained from other websites to help advertisers better reach their targeted audiences. Targeting may be accomplished by tailoring advertising to interests that they infer from your browsing of our sites and your interaction with other websites where these ad servers also are present.

If you choose to interact with specific advertisers who advertise on the Prime Websites, the information you provide to them is subject to the conditions of their specific privacy policies. In addition, responding to or interacting with a particular advertisement, may result in you later receiving a targeted advertisement on our websites or on other sites as a result of an ad server or ad network concluding that you fit within a particular audience an advertiser is trying to reach.

The Prime Websites also include social network or other third-party plug-ins and widgets that may provide information to their associated social networks or third-parties about the IDT page you visit, even if you do not click on or otherwise interact with the plug-in or widget.

For further details about how your personal information is used including transfers to countries outside the European Economic Area, please refer to the section headed “Use of Your Information” in our [Terms & Conditions](#). We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy. These steps include (i) requiring those companies, by contract, to treat your information securely and use it only in accordance with this Privacy Policy and (ii) the Information Security measures listed below.

How to Limit the Sharing and Use of Your Information

You have choices about how IDT shares and uses your personal information.

1. Opting Out of Email and Text Marketing Messages

Marketing emails you receive from IDT include an unsubscribe instruction usually found at the bottom of the email that you may use to opt out of receiving future marketing-related emails. Text and SMS message solicitations from IDT also contain an opt-out feature that you can use to prevent future marketing text and SMS messages from us. Your ability to manage some Prime Card products and services could be limited if you withdraw your consent to receive such text and SMS messages.

2. Information Used for Online Advertising

You have choices about whether certain information is collected on the Prime Websites. You can limit the collection of certain website information by deleting or disabling cookies, as described above. Please note that disabling cookies may prevent you from using specific features on our sites and other websites, such as ordering products or services and maintaining an online account.

Working Together to Help Keep Children Safe

IDT does not knowingly market to or collect information from children under the age of 13 without obtaining verifiable parental consent. If you allow a child to use your device or Prime Card services, you should be aware that their personal information could be collected as described in this policy. We encourage parents to be involved in the online activities of their children to ensure that no information is collected from a child without parental permission. The IDT network may not be used by customers in any manner for the storage, transmission or dissemination of images containing child pornography or any other illegal or inappropriate activity involving children and we will report any instances of such activity of which we become aware to the appropriate law enforcement authorities.

Information Security

IDT has technical, organisational and physical safeguards in place to help protect against unauthorised access to, use or disclosure of customer information we collect or store, including personal information. Employees are trained on the importance of protecting privacy and on the proper access to, use and disclosure of customer information. Under our practices and policies, access to sensitive personal information is authorised only where the customer has given their explicit consent to such access or in limited, exceptional circumstances permitted by law. Personal information is retained only as long as reasonably necessary to fulfill the purposes for which such information has been collected. IDT secures the personal information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. Personal information (such as a credit card number) is transmitted to our websites through the use of Secure Socket Layer (SSL) encrypted protection. The Prime Websites are PCI compliant in connection with your credit card information.

Although we work hard to protect personal information that we collect and store, no program is 100% secure and we cannot guarantee that our safeguards will prevent every unauthorised attempt to access, use or disclose personal information. IDT maintains security and incident response plans to handle incidents involving unauthorised access to private information we collect or store. If you become aware of a security issue, please contact us.

Contact Information

If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices you may contact us at:

IDT Financial Services Limited
Attention: Customer Services,
PO Box 1374,
Gibraltar

Email: customerservices@idtprime.com

Accessing and Updating Your Information

We strive to keep our customer records as accurate as possible. You may correct or update your Prime Card customer information (including changing your marketing preferences) by calling an IDT customer service representative at 0870 034 0030 or by emailing customerservices@idtprime.com or by accessing your account online and providing the updated information there.

Links to and from non-IDT Websites and Content

Prime Websites may contain links to non-IDT sites. In addition, Prime Card applications or other content may be included on web pages and web sites that are not associated with IDT. We have no control over these non-IDT sites and are not responsible for the content on these sites or

platforms or the privacy policies and practices employed by these sites and platforms. We recommend that you review the policies and practices of the sites you visit.

Information Sharing: Social Networking

Some IDT Prime Websites, applications, and services may allow you to participate in blog discussions, message boards, chat rooms, and other forms of social networking and to post reviews. Please be aware that these forums are accessible to others. We urge you to not submit any personal information to these forums because any information you post can be read, collected, shared, or otherwise used by anyone who accesses the forum. IDT is not responsible for the information you choose to submit in these forums. If you post content to information sharing forums, you are doing so by choice and you are providing consent to the disclosure of this information.

Changes to This Policy

We reserve the right to make changes to this Privacy Policy, so please check back periodically for changes. You will be able to see that changes have been made by checking to see the effective date posted at the beginning of the policy.

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