



### **IDT Energy Network Privacy Policy**

At IDT Energy, Inc. ("IDTEN"), we understand how important it is, as an Internet user, to safeguard and protect your personal information. We remain committed to preserving your right to privacy. We would like to take this opportunity in this Privacy Policy to set out for you the manner in which we will collect, use, disclose and otherwise manage your personal information.

### **Collection of Personal Information**

It is standard IDTEN policy to not collect personally identifiable information from anyone unless such information is provided to us voluntarily and knowingly except as otherwise provided in this Policy or asked for anywhere on our websites. We only collect personal information that you provide us when you:

- Enroll to become an Independent Representative or Partner of the company;
- Sign-up for any of our offered products or services;
- Access our websites;
- Contact our customer service or rep support departments;
- Provide us with comments or suggestions;
- Make payments online;
- Sign-up for any newsletter, promotion or marketing related communications.

### **How We Use Your Information**

IDTEN uses your personal information for a number of reasons including, but not limited to, the following:

- Develop, enhance, market or provide IDTEN products and services;
- Send electronic communications to you regarding products and services available through IDTEN or any of its affiliates;
- Enforce our contract(s) or agreement(s);
- Prevent fraud and other prohibited/illegal activities;
- Meet various legal and regulatory requirements; or
- Otherwise, as disclosed to you at the point of collection or throughout your experiences with IDTEN.

Your personal information may be collected, stored and processed in the United States or any other country in which IDTEN or its corporate affiliates, subsidiaries, vendors, partners or agents maintain facilities. By using IDTEN products or services (including your websites), you consent to any such transfer of information outside of your country.

All information is retained throughout the duration of any contract period as well as for a period of up to 3 years after the termination of customer contracts and any renewals thereof.

### **How We Protect Your Information**

We will not sell or make available your personal information to unaffiliated companies for commercial purposes unrelated to IDTEN. However, we may use this information to inform you regarding products or services that may be of interest to you. IDTEN will not disclose any information about you to unaffiliated companies or organizations without your consent, except as disclosed to you in this Policy, unless:

- a) We are required to do so by law;
- b) We believe it necessary to respond to an inquiry or provide you with a product or service you requested;
- c) It is necessary to make good on our Terms and Conditions Agreement we have entered into with you; or
- d) To protect the rights, property or personal safety of any other person, including another IDTEN customer or any member of the public.

IDTEN and its affiliates recognize that by utilizing our website and related online services you are placing trust in us. We want to assure you that we will take certain precautions to protect your information. In order to access and operate the Website and related back-office systems, resources, and online tools, we may share your personal information with a service partner under strict conditions. We will not otherwise

disclose your personal information to other companies without your explicit consent.

### **How You Can Access Your Information**

We understand that certain information changes due to circumstance, and we want to make sure that we have accurate and most up-to-date personal information for you. Therefore, to review, verify, or correct your personal information, please contact our rep support department in writing. IDTEN may not be able to provide you with access to certain of your personal information, where such refusal is permitted or required by applicable law or regulatory requirements. IDTEN will inform you of the reasons why, subject to any legal or regulatory restrictions, access has been denied.

### **Choosing Your Communication Preferences**

By contacting IDTEN's rep support department, you may change or withdraw your consent to receive marketing communications from IDTEN at any time, subject to legal or various contractual restrictions and reasonable notice in writing. In some circumstances, a change in or withdrawal of consent may limit our ability to provide certain products or services to, or allow you to acquire products or services. Because such marketing communications are developed in advance, you may sometimes receive solicitations after we receive a change in your consent to provide you with communications.

Unless you advise us otherwise, we will assume that by receiving a copy of this Privacy Policy or by continuing to deal with IDTEN or its affiliated entities, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

### **Safeguard Measures to Protect Your Personal Information**

IDTEN is committed to protecting the security of your personal information that was voluntarily and knowingly provided to us. We use various technology, physical and organizational protection measures and procedures designed to help protect your personal information from unauthorized access, use, or disclosure that includes, but not limited to, encryption, passwords, physical security, etc. While we strive to protect your personal information, IDTEN cannot ensure or warrant that the personal information or private communications you transmit to us will always remain private, and you do so at your own risk.

To the extent that passwords are used to help protect your account and personal information, it is your responsibility to keep your password confidential. Do not share your password information with anyone. If you are sharing a computer or

attempt to access your website from a public location other than your own, you should always log out before leaving a website or similar web application to protect access to your information from any subsequent users.

We will never require you to transmit your SSN on the Internet unless the connection is secure or the SSN is encrypted. Further, we will not require you to transmit your SSN to access a website without requiring additional authentication to which you will be the sole person with knowledge of that information.

IDTEN takes many precautions, including administrative and technical measure, to protect your personal information against theft, mishandling and loss. Additionally, IDTEN protects against misuse of your information, such as unauthorized access, disclosure, alteration, and destruction of your personal information. No one, including IDTEN, can give absolute assurance that your information will be 100% all of the time, due to the nature of the Internet and its vulnerability. IDTEN will not be held responsible for events arising from unauthorized access to your personal information.

### **Other Parties Whom IDTEN May Share Your Personal Information**

We may share your personal information with IDTEN affiliates, subsidiaries, vendors, business partners or agents to provide you with product(s) or service(s) you request or to make our business of that of our corporate affiliates more responsive to your needs. We may also disclose your personal information in connection with law enforcement, fraud prevention, or other legal action; as required by law or regulation; or if IDTEN reasonably believes it is necessary to protect IDTEN or its affiliates, its customers, or the public. In addition, we may share your personal information with business partners that help IDTEN or its affiliates analyze and/or improve our communication or relationship with you. IDTEN or its affiliates may also provide your personal information to government entities to determine your eligibility for particular product(s) or service(s). Except as described herein, we will not disclose your personal information to third parties for their own marketing purposes unless you have provided consent.

### **Use of 'Cookies'**

When you access IDTEN websites, information in the form of a 'cookie' or similar file type may be automatically downloaded to your computer. These are small text files that are used to recognize repeat users, identify online behavior patterns and trends, and facilitate the user's access to and

use of our website, and tracks behavior of the pages you visit, among other uses.

Our website may automatically collect cookies and other information including, but not limited to, your IDTEN domain name so that we may compile aggregate data for statistical purposes to improve your user experience when visiting our website and to better administer the web pages available through IDTEN. This helps us continue to enhance your online experience while visiting our website. This means we may collect information about your visits to our web pages, including the pages you view, the links you click, and other actions you take while visiting our website. We may also collect certain information the browser you used to come to our website, such as your Internet Protocol (IP) address, browser type, language preference, access times, the Uniform Resource Locator (URL) of the website that referred you to our website and to which URL you browse away from our site. Should not want 'cookies' to be sent or stored on your system, most Internet browsers will allow you to delete 'cookies' from your computer's hard drive, prevent them from being stored, or signal a warning before a 'cookie' is stored.

#### **Online Privacy for Children**

IDTEN's websites are not intended for use by children and does not knowingly collect any information from children under the age of 18 IDTEN encourages all children and young teens to ask their parents for consent and authorization before providing any information about themselves or their household to anyone over the Internet.

#### **Changes to the IDTEN Privacy Policy**

From time-to-time, we may find it necessary to update this Privacy Policy. If and when certain changes are made to the Privacy Policy describing how IDTEN will use your personal information, then we will revise the Policy to reflect such changes and revise the effective date of this Policy, located at the end of this Policy. For your own records, we encourage you to periodically review this Policy to remain informed of the measures that IDTEN is taking to protect your personal information.

#### **Questions over Privacy**

This website is owned, operated, and maintained by IDTEN. The purpose of this Privacy Policy is to provide you with assurance and explain IDTEN's policy to ensure that your personal information is protected and properly used according to Policy.

If you have any questions about this Policy, please feel free to email us at [repsupport@idtenergynetwork.com](mailto:repsupport@idtenergynetwork.com) or write us at:

#### **IDT Energy Network**

520 Broad Street

Newark, NJ 07102

Attention: Compliance Department

If you would like for IDTEN to update its records because your information is out of date or inaccurate, please contact us by email at [repsupport@idtenergynetwork.com](mailto:repsupport@idtenergynetwork.com) and we will modify your record accordingly.

Effective Date of this Privacy Policy: November 10, 2015