

# Privacy Policy

Effective July 01, 2022

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## 1. INTRODUCTION

Working Assets, Inc. and its subsidiaries and brands, including CREDO Long Distance (collectively “CREDO,” “CREDO Long Distance,” “we,” “us,” or “our”) are committed to preserving your privacy and safeguarding your sensitive information. The following statements describe our general information-gathering and usage practices.

## 2. INFORMATION COLLECTION

CREDO Long Distance primarily collects personally identifiable information from and about individuals who use our services, take actions with us, or visit our websites. This section describes the categories of personal information CREDO Long Distance collects and the ways that CREDO Long Distance collects them.

CREDO Long Distance does not target minors as customers, and does not intentionally collect information from people under 13 years of age.

### 2.1 Information You Provide to Us

#### 2.1.1 Account Information

When you sign up for services with CREDO Long Distance, you provide information that we use to open an account, process an order or action, or establish a membership with CREDO Long Distance. The information you provide may include:

- **Contact Information:** Your name, email address, address, and phone numbers
- **Payment Information:** Your bank account or credit card information
- **Order Information:** A list of the products you purchase from us, the amount and types of telephone services you enroll in—this may include the date and method by which you joined CREDO and the dates of any purchases and account changes
- **Action Information:** A list of any contributions you make through CREDO, and any other actions you take through CREDO—this may include the date and method by which you joined CREDO and the dates of any actions and account changes

#### 2.1.2 Additional Information You Choose to Provide

In the course of using CREDO Long Distance’s services or taking an action with CREDO, you may choose to provide us with additional personal information:

- **Other Information:** When you engage in open ended communication with CREDO Long Distance by filling in a form on our site, responding to a survey from us, entering a contest or sweepstakes, or communicating directly via phone, email, or mail with a CREDO Long Distance representative, you may voluntarily choose to provide us with personal information that may be collected and stored along with the communications themselves.

## 2.2 Information We Collect Automatically

### 2.2.1 Information We Collect Automatically When You Use CREDO Long Distance Telephone Services

When you are enrolled in our telephone services, we receive information from our underlying carrier about your usage of those services, including:

- **Phone Records:** The phone numbers you call, the phone numbers you receive calls from, the timing and duration of your calls, and billing information related to your international usage

When you are enrolled in our telephone services, we also generate account and billing data based on the services and plans you're enrolled in, including:

- **Billing Information:** A monthly bill with itemized charges for long distance telephone services based on your usage records
- **Account Number:** A number CREDO Long Distance assigns to long distance telephone accounts

CREDO Long Distance is committed to minimizing the data it collects and stores about how you use our telephone service. Accordingly, we want you to be aware that:

- CREDO Long Distance **does not** receive or store the content of customer communications sent using our services except customer communications directed to us for customer service purposes.

### 2.2.2 Information We Collect Automatically When You Visit Our Websites

We use website cookies, pixels, and similar tools to identify return visitors to our websites and automatically collect information about you when you visit any of our websites, including:

- **Identifiers and Device Information:** Your IP address, device type, operating system, browser type, and internet service provider
- **Geo-location:** city and country
- **Site Use Information:** Your referring URL, referring ad/campaign, time and date of any logins, which site pages you visit, and how you interact with them
- **Do Not Track Signals:** CREDO Long Distance may receive "do not track" signals from your browser when you visit our websites. However, given the lack of a standard for interpreting those signals, we are not currently set up to respond to them.

### 2.2.3 Additional Information We May Collect Automatically

- **Interaction Analytics:** In addition to the Order Information and Action Information listed in Section 3.1.1, we keep a record of what emails we've sent you and when, the IP address of the device you used to open them, the links you've clicked in those emails, and which partner organization, if any, referred you to CREDO.

- **Inferences from Other Information:** We keep a record of inferences about you or your account from the other information collected in this Section 2, including preferences, characteristics, behaviors, and evaluations

## 2.3 Additional Information We Collect About You From Third Parties

- **Credit Card Product Information:** If you have one of our branded credit cards, as long as your card active is we receive an annual notice from the issuing bank that includes your name, address, phone number, and the last four digits of your social security number. This file lets us know that you are still a user of our product, but CREDO Long Distance does not keep or otherwise use the file or the information it includes.

## 2.4 Third Party Collection Practices

Our sites may link to merchants and information sites. Each of these sites has its own privacy practices and any information you share with these sites is subject to their policies and practices and is independent of CREDO Long Distance.

# 3. INFORMATION USE

## 3.1 Purposes

This section describes the categories of purposes for which CREDO Long Distance uses the information we collect about you. Capitalized terms refer to the categories of personal information described in Section 2.

### 3.1.1 We Use Your Information to Provide the Services You've Requested

This might include things like completing a transaction or order, creating and managing member accounts, enabling you to use our services, managing our donations program, sending you account-related messages, providing customer service, producing bills, and providing you information about your telephone usage.

To do this, we may use your Account Information (including Contact Information, Payment Information, Order Information, and Action Information), information we collect automatically (including your Phone Records, Billing Information, Account Number, Interaction Analytics, Inferences from Other Information, Identifiers and Device Information, and Site Use Information), and information we collect from third parties (including Credit Card Product Information).

### 3.1.2 We Use Your Information to Improve, Audit, and Develop Our Products and Services

This might include things like ensuring the proper functioning of accounts and services, improving the usability of existing services, developing new products and features, conducting research and testing, and administrating website and service data analytics that measure the performance of our products and services.

To do this, we may use your Account Information (including Contact Information, Payment Information, Order Information, and Action Information), additional information you choose to provide (Other Information), and information we collect automatically (including your Phone Records, Billing Information, Account Number, Interaction Analytics, Inferences from Other Information, Identifiers and Device Information, and Site Use Information).

### **3.1.3 We Use Your Information to Protect CREDO Long Distance’s Services, Member Accounts, and Member Information**

This might include verifying users who access accounts and personal information, ensuring the technical security of your account and personal information, ensuring the security of our business, detecting and preventing fraud, abuse, or other security incidents, and enforcing our Terms & Conditions, Terms of Service, and other agreements and policies.

To do this, we may use your Account Information (including Contact Information, Payment Information, Order Information, and Action Information), additional information you choose to provide (Other Information), information we collect automatically (including your Phone Records, Billing Information, Account Number, Interaction Analytics, Inferences from Other Information, Identifiers and Device Information, Geo-Location, and Site Use Information), and information we collect from third parties (including Credit Information and List Information).

### **3.1.4 We Use Your Information to Comply With Our Legal Obligations**

This might include things like complying with federal, state, and local laws and regulatory requirements, complying with audits, and resolving disputes.

To do this, we may use your Account Information (including Contact Information, Payment Information, Order Information, and Action Information), additional information you choose to provide (Other Information), information we collect automatically (including your Phone Records, Billing Information, Account Number, Interaction Analytics, Inferences from Other Information, Identifiers and Device Information, Geo-location, and Site Use Information), and information we collect

### **3.1.5 We May Use Your Information for Other Business Purposes**

This might include any other purpose that we disclose to you at the time we collect the information or that you have otherwise consented to.

## **3.2 Email Policy**

CREDO Long Distance uses your e-mail address to communicate with you about your account and the services you’re enrolled in.

## **3.3 Cookie Policy**

Cookies are small text files containing information that are stored by your web browser. This technology allows us to remember you when you visit or take actions on our sites. CREDO Long Distance uses cookies to identify return visitors, allow you to log in to your account, control the serving of ads to you while you are online, and track and analyze how our websites are being used. You can set your browser to not accept cookies, but this may limit your ability to use our websites.

## **4. INFORMATION SHARING AND DISCLOSURE**

### **4.1 Third-Party Sharing**

While CREDO Long Distance does not sell your information, from time to time we share your personal information with third parties at your direction or with your explicit permission. We also need to share your information with others on a more regular basis in order to operate our business and provide services to

you. This section describes the categories of third parties CREDO Long Distance may share your information with in the regular course of business. Capitalized terms refer to the categories of personal information described in Section 2.

#### **4.1.1 Affiliated Companies**

CREDO Long Distance shares staff, facilities, and systems with its parent company. Accordingly, we also share personal information between the companies in order to provide, analyze, improve, and develop our services.

This applies to all categories of personal information we collect.

#### **4.1.2 Service Providers**

We share information with a variety of service providers that perform services on our behalf. For example, these service providers may include companies that, among other things, help us provide customer service, produce and deliver customer bills, provide telephone services, develop website interaction analytics, and meet our regulatory obligations. We only provide personal information to these service providers if it's necessary for them to perform the tasks we've contracted with them to do. We require that these service providers secure and protect the information from unauthorized disclosure and limit their use to the contracted purposes.

Depending on the service provider, this sharing may include your Account Information (including Contact Information, Payment Information, and Order Information, and Action Information), additional information you choose to provide (Other Information), and information we collect automatically (including your Phone Records, Billing Information, Account Number, Interaction Analytics, Inferences from Other Information, Identifiers and Device Information, Geo-location and Site Use Information).

#### **4.1.3 Government Regulators and Law Enforcement**

CREDO Long Distance may disclose your information to a government regulator or other authority to comply with our legal obligations in case of a regulatory audit or investigation.

We will also release personal information pursuant to a valid U.S. subpoena, summons, or court order. We may release name and address information to a governmental entity without a subpoena or court order in the case of a good faith belief that an emergency involving danger of death or serious physical injury to any person requires disclosure without delay. We work to maintain a balance between complying with our legal obligations and protecting the privacy of our members' information against improper requests. So, unless specifically prohibited by court order or statute, we will notify you in writing of a request prior to releasing information in response to a subpoena, summons, or court order, or after the fact, in the case of an emergency request.

### **4.2 Company Sale or Change of Corporate Control**

If CREDO Long Distance enters into a merger, acquisition, bankruptcy, receivership, sale of all or a portion of its assets, your information will also be shared and/or transferred as one of the business assets of CREDO Long Distance.

### **4.3 Aggregated or Anonymized Information**

CREDO Long Distance and/or its third party providers may provide aggregated or anonymized information such as the number of users who visit a particular linked site to other parties.

## **5. INFORMATION PROCESSING AND RETENTION**

### **5.1 Telephone Account and Usage Record Retention**

CREDO Long Distance is committed to minimizing the data it collects and stores about how you use our telephone services. CREDO Long Distance retains customer name, address, phone number, email address, and product type information for historical purposes. CREDO Long Distance stores individually-identifiable customer telephone billing data for five years unless longer storage is needed for tax, business, accounting, or legal purposes.

### **5.2 Information Transmission**

To protect the security of your personal information, we use Transport Layer Security (TSL), which ensures all information is encrypted while being transmitted across the Internet between CREDO Long Distance's system and your web browser.

Please note that, whenever CREDO Long Distance handles information that you enter on its sites or on its apps, regardless of where this occurs, we take steps to ensure that your information is treated securely and in accordance with the relevant Terms of Service and this Privacy Policy. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, CREDO Long Distance cannot ensure or warrant the security of any information you transmit to us or from our online products or services or on our apps, and you do so at your own risk. Once we receive your transmission, we make our best effort to ensure its security on our systems.

### **5.3 Information Security**

Our sites and apps have security measures in place to protect the loss, misuse and alteration of the information under our control. CREDO Long Distance follows all state and federal guidelines protecting customer information. Additional protections apply for certain information CREDO Long Distance collects and maintains about the telecommunications services you obtain from CREDO Long Distance and how you use those services. This information is categorized by the federal government as Customer Proprietary Network Information or CPNI, and its use and sharing is governed by specific laws.

## **6. YOUR RIGHTS**

### **6.1 California Privacy Rights**

If you are a California resident, the California Consumer Privacy Act ("CCPA") allows you to request that CREDO Long Distance disclose to you the categories and/or specific pieces of personal information CREDO Long Distance has collected about you in the last twelve months, as well as the categories of sources for that information, the business or commercial purposes for collecting that information, and the categories of third parties with which the information was shared. Under certain circumstances, California residents may also request deletion of personal information from our records. These are rights afforded to you by California law, and CREDO Long Distance will not charge you different prices or discriminate against you if you exercise those rights. Please be aware that, pursuant to various CCPA exceptions and in order to protect your information and our ability to provide services, there are certain specific pieces of personal information we will not provide to you and certain categories of information we will not delete.

If you are a CREDO Long Distance account holder in California and wish to make a request under this law, please contact us at [customerservice@credolongdistance.com](mailto:customerservice@credolongdistance.com). You will be asked to provide your

name and account information. We may also require that you provide additional information and submit a signed affidavit for verification purposes.

We do not sell your personal information. We do, however, share personal information with third parties for business purposes as described in Section 5. This includes advertising and marketing on our sites and elsewhere based on users' online activities over time and across different sites, services, and devices.

## **6.2 Nevada Privacy Rights**

We do not sell your personal information. To contact us regarding NRS 603(a) – Nevada's online privacy law, Nevada members may email us at [customerservice@credolongdistance.com](mailto:customerservice@credolongdistance.com).

## **7. PRIVACY POLICY CHANGES**

This policy may be changed from time to time. Please refer to the effective date of the policy to determine whether changes have been introduced. To inquire about the content of such changes, or if you have any questions about this Privacy Policy, the practices of CREDO Long Distance sites, or your dealings with our web sites, please contact:

Customer Service Team  
[customerservice@credolongdistance.com](mailto:customerservice@credolongdistance.com)