

# Privacy Policy Notice

Last Updated on December 30, 2020

## **I. Personally-Identifiable Information and Non-Personally Identifiable Information.**

Tsaishen.co and Tsaishen.crypto (also referred to herein as "Tsaishen") may collect two different types of information, Personally Identifiable Information ("PII") and Non-Personally Identifiable Information ("Non-PII"). PII that we collect is information that identifies you as an individual – and may include your name, address, telephone number, e-mail address, credit card information, billing address and shipping information. Non-PII is aggregated information, demographic information, IP addresses, user behavior data from web interaction metrics tools and other information that does not reveal your specific identity. PII and Non-PII may be collected anytime you access or use a Tsaishen website. PII and Non-PII may also be collected by Tsaishen during in-person discussions, telephone conversations, and electronic or other written communications. Tsaishen also collects information via cookies; blocking cookies may render you unable to access certain Tsaishen products, services, or websites.

Tsaishen uses PII to respond to your inquiries, provide you with services you have requested, keep you informed of services Tsaishen thinks may be of interest to you, and otherwise personalize your experience with Tsaishen, and other reasons. Tsaishen does not sell or lease PII about you to others, and may in some cases be liable for so doing under the Privacy Shield Framework outlined below. Tsaishen may provide your e-mail address to affiliates or users who refer you to us, or through whom you create a Tsaishen account. Tsaishen shares your PII with Tsaishen affiliates and third parties contracting with Tsaishen to provide services to you, including financial institutions, API integrators, and other third-party software services to assist with locating and/or purchasing property. Tsaishen employees who design our databases and software, and those employees who provide you with customer service, along with our customer service software partners, also have access to PII as part of their job in providing services to You. Tsaishen may also share PII when required by law, or when you have expressly requested Tsaishen to do so. Tsaishen reserves the right to disclose and use your PII if Tsaishen believes it is necessary to: (a) respond to legal process, e.g., a subpoena; (b) respond to a law enforcement agency's request; (c) enforce the Terms; or (d) protect the rights, privacy, safety, property, or operations of Tsaishen or third parties;

Because Non-PII does not personally identify You, Tsaishen reserves the right to use and disclose to third parties Non-PII for any purpose.

Tsaishen maintains reasonable physical, administrative and technical safeguards to protect PII from loss, misuse, or unauthorized access, disclosure, alteration or destruction. Tsaishen enforces its Privacy Policy via self-assessment.

Tsaishen reserves the right to change this privacy notice, which changes will become effective upon posting of the revised notice on <https://www.Tsaishen.co/privacy>, [Tsaishen.crypto](https://www.Tsaishen.crypto), or upon emailing of the changes to You at the email address You provided to Tsaishen, or as required by law.

## **II. Links to or From Other Sites.**

Except where expressly stated by Tsaishen, Tsaishen is not affiliated or associated with operators of any third-party websites that link to or are linked from any Tsaishen-maintained

website. Tsaishen disclaims any responsibility for the accuracy or content of information found on third party websites that link to or are linked from any Tsaishen website. Tsaishen disclaims any responsibility for the security of any information (including without limitation credit card and personally identifiable information ("PII")) that you may provide to any third party. Tsaishen reserves the right, at any time and in its sole and absolute discretion, to block links to any Tsaishen-maintained website through technological or other means without prior notice.

### **III. Information; Registration; User Names and Passwords**

As a Tsaishen website user, you will be required to create an account with Tsaishen. You warrant that the information you provide Tsaishen is truthful and accurate, and that you are not impersonating another person. You are responsible for maintaining the confidentiality of any password you may use to access your Tsaishen account, and you agree not to transfer your password or User name, or lend or otherwise transfer your use of or access to your account, to any third party. You are fully responsible for all transactions with, and information conveyed to, Tsaishen under your account. You agree to immediately notify Tsaishen of any unauthorized use of your password or User name or any other breach of security related to your account. You agree that Tsaishen is not liable, and you will hold Tsaishen harmless, for any loss or damage arising from your failure to comply with any of the foregoing obligations.

### **IV. EU-US and Swiss-US Privacy Shield Frameworks.**

Tsaishen complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from European Union and Switzerland to the United States, respectively. Tsaishen has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit [www.privacyshield.gov](http://www.privacyshield.gov). For full definitions of the Privacy Shield Principles, please visit [www.privacyshield.gov/EU-US-Framework](http://www.privacyshield.gov/EU-US-Framework).

Under the Privacy Shield, you have the right to access, correct, or delete your personal data. You also have the right to limit Tsaishen's use of your data – including the right to opt-in or out of receiving communications from Tsaishen. To exercise any of these rights, please send an email to [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com).

**Third party data transfer.** Tsaishen may be liable for the transfer of EU and/or Swiss personal data to third parties acting as our agents unless we can prove we are not responsible for the event given rise to the damages.

**The Choice Principle.** Note that we may be required to release personal data of EU and/or Swiss individuals in response to lawful requests by public authorities including to meet national security and law enforcement requirements.

In compliance with the EU-US and Swiss-US Privacy Shield Principles, Tsaishen commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should contact Tsaishen at:

Email: [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com)

Tsaishen has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint. Under certain limited conditions, individuals in the European Union or Switzerland may have the right to invoke "last resort" binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission. The Federal Trade Commission has jurisdiction with enforcement authority over Tsaishen's compliance with the Privacy Shield.

## Tsaishen' GDPR Policy

Last Updated December 30, 2020

**I. Collection and Use of Personal Information.** Tsaishen.co and Tsaishen.crypto (also referred to herein as "Tsaishen") may collect personal information from You. Personal information is information relating to an identifiable person who can, by virtue of such information, be directly or indirectly identified. You may be asked to provide Your personal information anytime You are in contact with Tsaishen or a Tsaishen affiliated company. Tsaishen and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if You chose not to do so, in many cases we will not be able to provide You with our products or services or respond to any queries You may have.

### **II. What personal information we collect**

- When You create a Tsaishen User Account, purchase a product, download a software update, or contact us, we collect a variety of information, including Your name, mailing address, phone number, e-mail address, and contact preferences. When payment, or payment information, is required, we will direct You to submit credit card information through a third-party such as PayPal or Stripe.
- When You, as a Tsaishen Account Holder, acquire information regarding Your customers and then upload that information to Tsaishen, Tsaishen will store whatever personal information regarding Your customers that You have uploaded on Tsaishen production servers.

### **III. How we use Your personal information.**

- The personal information we collect allows us to keep You posted on Tsaishen's latest product announcements, software updates, and upcoming events. If You don't want to be on our mailing list, You can opt out anytime by navigating to the unsubscribe link in the last e-mail You received from Tsaishen. You will have the option to unsubscribe from an individual list, or from all Tsaishen lists.

- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes.
- We may use Your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of Tsaishen Account holders.
- From time to time, we may use Your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to Your interaction with Tsaishen, You may not opt out of receiving these communications.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve Tsaishen' products, services, and customer communications.

**IV. Collection and Use of Non-Personal Information.** We also collect data in a form that does not identify any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as business, language, zip code, area code, unique device identifier, referrer URL, and the time zone where a Tsaishen product is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on any of our websites. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is non personal information.
- We may collect and store details of how You use our services. This information may be used to improve the relevancy of results provided by our services.

**V. Cookies and Other Technologies.** Tsaishen' websites, e-mail messages, and advertisements may use "cookies" and other technologies such as tracking, re-marketing tags, and pixels based on context, e.g., a search query, a channel You are reading, or inferred interests. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non personal information. We design and target advertising based on how You interact with Tsaishen. If You do not wish to receive ads targeted to Your interests from Tsaishen', You can choose to limit ad tracking, which will opt Your Tsaishen ID out of receiving such ads regardless of what device You are using. You may still see ads based on context like a search query or a channel You are reading. Tsaishen and our partners also use cookies and other technologies to remember how You use our website and software. Our goal in these cases is to make Your experience with Tsaishen more convenient and personal, and provide You better customer service. To limit ad tracking, you may opt-out by clicking on this [tool](#) for (USA) or this [tool](#) for (EU) both of which are not directly Tsaishen-affiliated. You may also use Your browser's

settings to disable cookies and other tracking tools. Please note that certain features of the Tsaishen website will not be available once cookies are disabled.

We gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data. We use this information to administer the site, to learn about user behavior on the site, to improve our product and services, and to gather demographic information about our user base as a whole. Tsaishen may use this information in our marketing and advertising services.

In some cases, we use a “click-through URL” linked to content on the Tsaishen website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our marketing communications. We also use it to account for Affiliate activity and pay Affiliate commissions and bonuses.

**VI. Disclosure to Third Parties.** At times Tsaishen may make certain personal information available to strategic partners that work with Tsaishen to provide products and services, or that help Tsaishen market to customers. Personal information will only be shared by Tsaishen to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

- **Affiliates.** Tsaishen will provide Your email address to affiliates or users who refer You to us, or through whom You create a Tsaishen account.
- **Service Providers.** Tsaishen shares personal information with companies who provide services such as information processing, fulfilling orders, delivering products to You, managing and enhancing customer data, providing customer service, and assessing Your interest in our products and services. Tsaishen also shares Your information with financial institutions who provide payment (both to and from You) services. Finally, Tsaishen provides Your personal information with API integrators, and other third party software services to assist You with your property search. These companies are obligated to protect Your information and may be located wherever Tsaishen operates.
- **Legal.** It may be necessary – by law, litigation, or requests from government authorities within or outside Your country of residence – for Tsaishen to disclose Your personal information. We may also disclose information about You if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about You if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users.
- **Corporate Change.** Additionally, in the event of a reorganization, merger, or sale of Tsaishen we may transfer any and all personal information we collect to the relevant third party.

**VII. Protection of Personal Information.** Tsaishen takes the security of Your personal information very seriously. When Your personal data is stored by Tsaishen, we use computer systems with limited access housed in facilities using physical security measures. When You use

some Tsaishen products and services that by their nature are public facing, such as when You post on a Tsaishen forum, the personal information and content You share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information You choose to share or submit in these instances. For example, if You list Your name and e-mail address in a forum posting, that information is public. Please take care when using these features.

**VIII. Retention of Personal Information.** Tsaishen will retain Your personal information for as long as You have a Tsaishen account. After Your Tsaishen account is terminated, we will retain Your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

**IX. Access to Personal Information.** You can help ensure that Your contact information and preferences are accurate, complete, and up to date by logging in to Your account at <https://www.Tsaishen.co> and clicking login. For other personal information we hold, we will provide You with access (including a copy) upon Your request. We may decline to process requests that are frivolous, vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Access, correction, or deletion requests can be made by contacting [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com).

**X. Children & Education.** We understand the importance of taking extra precautions to protect the privacy and safety of children using Tsaishen products and services. Children under the age of 18, are not permitted to create their own Tsaishen IDs; instead, a parent must obtain the account and provide the parent's information to Tsaishen. If we learn that we have collected the personal information of a child under 18 we will delete the information as soon as possible.

**XI. Third Party Sites and Services.** Tsaishen websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties is governed by their privacy practices. We encourage You to learn about the privacy practices of those third parties.

**XII. Your Rights Under the GDPR.** If You are a citizen or a resident of a country in the European Union, the GDPR grants You the following rights:

**a. Access to Your Personal Data.** You have the right to receive a copy of Your personal data that is subject to processing by Tsaishen. Ordinary requests will be granted without charge to You within one calendar month of when You make the request. In cases of excessive, unreasonable, or repeated requests Tsaishen may charge You a reasonable fee and may require additional time to grant Your request. Also, Tsaishen may use reasonable means to confirm Your identity before granting any request for data so as to prevent granting fraudulent requests. To request a copy of Your personal data, please contact us by e-mail at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com).

**b. To have Your Data Corrected.** If Your personal data is erroneous or outdated, You have the right to have it corrected. To do so, please contact Tsaishen via e-mail at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com), or simply log in to Your account at <https://www.Tsaishen.co> and click on login.

**c. To be Forgotten.** You have the right to be forgotten by Tsaishen. You may exercise this right by e-mailing us at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com). We will comply with Your request, at no charge to You, within one calendar month by deleting Your account, along with all of Your personally-identifiable data that is subject to any Tsaishen processing. Naturally, after we grant Your request You will not have access to any Tsaishen products or services unless and until You open



a new Tsaishen account. Tsaishen may use reasonable means to confirm Your identity before granting any request for data so as to prevent the granting of fraudulent requests.

**d. To Restrict Processing of Your Data.** You can request that Your data not be processed via Tsaishen partners. You can make that request by e-mailing us at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com) and, if you wish, you can even specify which third parties to restrict from processing Your data. We will respond to Your request, at no charge to You, within thirty (30) days from when You make Your request. Please be advised that some of our partners, e.g., PayPal, are essential to Tsaishen services, so that if You block processing by them, Tsaishen's services may be unavailable to You.

**e. Portability.** You have the right to receive a copy of Your personal data that is subject to processing by Tsaishen in a portable format, or to have it transferred directly from Tsaishen to another party. Ordinary requests will be granted without charge to You within one calendar month of when You make the request. Tsaishen may use reasonable means to confirm Your identity before granting any request to transfer data to You or another party so as to prevent granting fraudulent requests. To request a copy of Your personal data in a portable format, or to request a direct transfer of Your data, please contact us by e-mail at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com).

**XIII. Your Responsibility Under GDPR.** If You are a Tsaishen User, there is a good probability that You are a business owner, using the Tsaishen software to find and purchase real properties and potentially sell them to Your customers. With respect to the customer data that You provide to Tsaishen, Tsaishen is a data processor and will comply with its obligations under the GDPR; but with respect to Your customers, You are probably a data controller, and if any of Your customers is a citizen or a resident of a country in the European Union, then You must ensure that You comply with Your obligations as a data controller under the GDPR; namely, You must ensure that You afford Your Customers the rights identified in section (a) above. Tsaishen sells software; it does not provide legal advice or legal services, nor does it sell a "done-for-you" GDPR compliance package. Please consult legal counsel of Your own choosing for advice on what You need to do to comply with GDPR.

**XIV. Our Companywide Commitment to Your Privacy.** To make sure Your personal information is secure, we communicate our privacy and security guidelines to Tsaishen employees and strictly enforce privacy safeguards within the company.

**XV. Privacy Questions.** If You have any questions or concerns about Tsaishen's Privacy Policy or data processing or if You would like to make a complaint about a possible breach of local privacy laws, please contact us at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com). When a privacy question or an access or download request is received, we have a team dedicated to addressing the specific concern or query which You are seeking to raise. In responding to Your request, we may need to request more information from You. If You are unsatisfied with the response You receive, You may refer Your complaint to the relevant regulator in Your jurisdiction. If You ask us, we will endeavor to provide You with information about relevant complaint avenues which may be applicable to Your circumstances. If You live in the European Economic Area, United Kingdom, or Switzerland, and You wish to contact us regarding questions or to exercise Your statutory rights, please contact us at [tsaishenco@gmail.com](mailto:tsaishenco@gmail.com).

**XVI. Updates to the Policy.** Tsaishen may update its Privacy Policy and this GDPR Policy from time to time, as posted on our website.