

## PRIVACY POLICY

This Privacy Policy describes the information we process to support the Tsū Social platform. This notice is also available in HTML format and is print enabled [[Click Here](#)].

### What kinds of information do we collect and the legal basis for processing the data?

To provide the best service we must process information about you. The types of information we collect depend on how you use the Tsū Social platform. You can access and delete information we collect by following the process set forth below in this Privacy Policy.

- **Things you and others do and provide.** We use your information to perform our contractual obligations with you and/or to comply with legal obligations. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve our the Tsū Social platform features we provide to you.
- **Information and content you provide.** We collect the content, communications and other information you provide when you use the Tsū Social platform, including when you sign up for an account, create or share content, and message or communicate with others. This can include information about the content you provide (like metadata), such as the location of a photo or the date a file was created. It can also include activity through features we provide. Our systems automatically process content and communications you and others provide for the purposes related to the Tsū Social platform. We use your information to perform our contractual obligations with you and/or to comply with legal obligations. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve our the Tsū Social platform features we provide to you.
- **Data with special protections.** You can choose to provide information on your the Tsū Social platform profile page about your religious views, political views, who you are "interested in," or your health. This and other information (such as racial or ethnic origin, philosophical beliefs or trade union membership) is subject to special protections under European Union ("EU") law. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation. We also use this information with your consent, or because we have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you and to provide you with the features you request.
- **Networks and connections.** We collect information about the people, pages, accounts, communities, interests and groups you are connected to and how you interact with them across the Tsū Social platform. We also collect contact information if you choose to upload or import into the Tsū Social platform (such as an address book), which we use for things like helping you and others find people you may know, communities you may be interested in and for the other purposes discussed in this Privacy Policy. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.
- **Your usage.** We collect information about how you use the Tsū Social platform, such as the types of content you view or engage with; the features you use; the actions you take; the people, communities or accounts you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used the Tsū Social platform, and what posts,

videos and other content you view. We use your information to perform our contractual obligations with you and/or to comply with a legal obligations. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.

- **Information about transactions.** If you sell or purchase goods or services on the Tsū Social platform or perform other transactions (such as when you make a donation), we may collect information about the sale, purchase or transaction. We do not collect your credit or debit card number and other card information, other account and authentication information or billing, shipping and contact details. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request.
- **Things others do and information they provide about you.** We also receive and analyze content, communications and information that other people provide when they use the Tsū Social platform. This can include information about you, such as when others share or comment on a photo or video you created, send a message to you, or upload, sync or import your contact information. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.
- **Device Information.** As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with the Tsū Social platform, and we combine this information across different devices you use. For example, we use information collected about your use of the Tsū Social platform on your phone to better personalize the content (including advertisements) or features you see on the Tsū Social platform on another device, such as your laptop or tablet, or to measure whether you took an action in response to a communication we sent you or advertisement we showed you on your phone on a different device. We use your information to perform our contractual obligations with you and/or to comply with a legal obligations. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.

Information we obtain from these devices includes: (i) device attributes such as the operating system, hardware and software versions, browser type, app; (ii) identifiers such as unique identifiers, device IDs, and other identifiers; (iii) device settings such your GPS location, camera or photos; (iv) network and connections such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address and, in some cases, information about other devices that are nearby or on your network; and (v) information from cookies. We use your information to perform our contractual obligations with you and/or to comply with legal obligations. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.

- **We may use Cookies, Tokens or similar technology.** Cookies, Tokens or similar technologies are small pieces of text or code used to store information on web browsers or apps. These are used to store and receive identifiers and other information on computers, phones, and other devices. Other technologies, including data we store on your web browser or device, identifiers associated

with your device, and other software, are used for similar purposes. In this Privacy Policy, we refer to all of these technologies as “Cookies.”

- **Why would we use cookies?** Cookies may help us to understand the information we receive about you, including information about your use of other websites and apps, whether or not you are registered or logged in. Cookies also may help us provide, protect and improve the Tsū Social platform and our service, such as by personalizing content, tailoring and measuring advertisements, and providing a safer experience. While the cookies that we may use may change from time to time, we use them for the following purposes:
  - **Authentication:** We may use cookies to verify your account and determine when you’re logged in so we can make it easier for you to access the Tsū Social platform and show you the appropriate experience and features.
  - **Site features and services.** Cookies can be used to enable the functionality that helps us provide the Tsū Social platform and our service. Cookies also help provide you with content relevant to your locale and provide you with the best experience possible.
  - **Security, site and product integrity:** Cookies can help keep your account and data on the Tsū Social platform safe and secure. Cookies also can be used to combat activity that violates our policies or otherwise degrades our ability to provide the Tsū Social platform.
  - **Analytics and research:** Cookies may allow a better understanding of how people may use the Tsū Social platform and our service so that we can improve them.
  - **Advertising, recommendations, insights and measurement:** Cookies also allow us to provide insights about the people who use the Tsū Social platform. Cookies help us show advertisements and to make recommendations for businesses and other organizations to people who may be interested in the products, services or causes they promote. Cookies also help measure the performance of ad campaigns for businesses that use the Tsū Social platform. Cookies can also be used to help you opt out of seeing advertisements.
  - **We use your information from Cookies with your consent.** We use your information from Cookies to perform our contractual obligations with you and/or to comply with a legal obligation. We also have a legitimate interest for using your information from Cookies to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.
  - **Do other parties use cookies in connection with the Tsū Social platform?** Yes, other parties may use cookies on the Tsū Social platform to provide services to us and the businesses that advertise on the Tsū Social platform.
  - **How can you control ads you see?** You can control how we use data to show you advertisements. Your browser or device may offer browser controls or settings that allow you to choose whether browser cookies or other technologies are set and to delete them. For more information about these controls, visit your browser or device's help material. Please understand that certain parts of the Tsū Social platform may not work properly if you have disabled browser cookie use.
  - **Information from partners.** Advertisers, app developers, and publishers can send us information they use about your activities off the Tsū Social platform— including information about your device, websites you visit, purchases you make, the advertisements you see, and how you use their services—whether or not you are logged into the Tsū Social platform. We also receive information about your online and offline actions and purchases from third-party data

providers who have the rights to provide us with your information. We require each of these parties to have lawful rights to collect, use and share your data before providing any data to us. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve our the Tsū Social platform features we provide to you. We have a legitimate interest in using your information to effectively market to you and analyze trends and patterns among our users.

## **How do we use the information collected and what is the legal basis for processing this data?**

We use the information we have as follows:

- **To improve and personalize the Tsū Social platform.** We use the information including location-related information to deliver the Tsū Social platform, including to personalize features and content and make suggestions for you (such as groups, communities or events you may be interested in or interests you may want to follow). We use your connections, preferences, interests and activities based on the data we collect and learn from you and others, how you use and interact with on the Tsū Social platform and the people, places, or things you're connected to and interested in to personalize the Tsū Social platform so that they are unique and relevant to you as possible. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation. We also have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features. We have a legitimate interest in using your information to effectively market to you and analyze trends and patterns among our users.
- **Provide measurement, analytics, and other business services.** We use the information we have to help advertisers and other partners measure the effectiveness and distribution of their advertisements and services and understand the types of people who use their services and how people interact with their websites, apps, and services. We have a legitimate interest in using your information to perform these activities and to effectively market to you and analyze trends and patterns among our users. We also have a legitimate interest in using this information to improve the Tsū Social platform features we provide to you.
- **Promote safety, integrity and security.** We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of the Tsū Social platform, and promote safety and security on the Tsū Social platform. For example, we use data we have to investigate suspicious activity or violations of our Terms of Use or other policies. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation.
- **Communicate with you.** We use the information we have to send you marketing communications, communicate with you about the Tsū Social platform, and let you know about our policies, terms and conditions. We also use your information to respond to you when you contact us. We have a legitimate interest for using your information to make the Tsū Social platform and its features relevant and personalized to you, to effectively market to you, and to provide you with the features you request. We also have a legitimate interest in using this information to improve the Tsū Social platform features. We use your information to perform our contractual obligations with you and/or to comply with a legal obligation.

## **How is information shared?**

We may share information with others in the following ways:

- **People you share and communicate with on the Tsū Social platform.** When you share content or communicate using the Tsū Social platform, you have the ability to choose who you want to share with, such as a group, all of your friends or the public. Public information can be seen by anyone, including if they don't have an account the Tsū Social platform. This includes your Tsū Social platform username; any information you share with a public audience; information in your public profile.
- **Content others share or reshare about you.** You should consider who you choose to share with, because people who can see your content and activities on the Tsū Social platform can choose to share it with others on and off the Tsū Social platform. For example, when you share content with specific friends or accounts, they can download, screenshot, or reshare that content to others across or off the Tsū Social platform. Also, when you comment on someone else's content, your comment is visible to anyone who can see the other person's content, and that person can change the audience later.

People can also use the Tsū Social platform to create and share content about you with the audience they choose. For example, people can share a photo of you, mention or tag you, or share information about you in their content or posts. If you are uncomfortable with what others have shared about you on the Tsū Social platform, you can report the content to [\[Customer Care\]](#) or contacting us at the address below.

- **Information about your active status on the Tsū Social platform.** Your friends and followers can see signals telling them whether you are active on the Tsū Social platform.
- **Apps, websites, and third-party integrations.** When you choose to use third-party apps, websites, or other services that use, or are integrated with, the Tsū Social platform, they may receive information about content you post or share. When you download or use such third-party services, they may be able to access your public profile on the Tsū Social platform. Apps and websites may access your list of the Tsū Social platform friends or followers if you choose to share that information. Information collected by these third-party services is subject to their own terms and policies, not our [Terms of Use](#), this Privacy Policy or our other policies.
- **Assignment, Change of Control and Transfer.** All of our rights and obligations under our Privacy Policy are freely assignable by us in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or new owner.
- **Sharing with Third Parties.** We work with third parties who help us provide and improve the Tsū Social platform. We also impose restrictions on how third parties can use and disclose the data we provide. Here are the types of third parties we share information with:
- **Third Parties who use our analytics services.** We provide aggregated statistics and insights to better understand how users of the Tsū Social platform are engaging with the Tsū Social platform community. For example, the number of users who viewed, reacted to, or commented on a particular post, as well as aggregate demographic and other information, for the purpose of better understanding how the Tsū Social platform users are interacting on the Tsū Social platform.
- **Advertisers.** We provide advertisers with reports about the types of people viewing advertisements and how their advertisements are performing, but we don't share personally identifiable information about our users (information such as your name or email address that identifies who are users are) without your permission. For example, we provide general demographic and interest information to advertisers (for example, that an advertisement was seen by a male or female between specific ages who live in a particular locale and have certain interests) to help better understand their

audience. We also may confirm which advertisements led you to interact with an advertiser or make a purchase.

- **Third Parties offering goods and services.** When you buy or subscribe for something on the Tsū Social platform, the content creator or seller can receive your public information and other information you share with them to complete the transaction, including shipping and contact details.
- **Other reasons.** We may also share your information with third parties for other or unanticipated reasons with your consent.
- **Law enforcement or legal requests.** We share information with law enforcement or in response to legal requests as necessary to meet legal requirements or fulfill our Terms of Use, this Privacy Policy and our other policies. More information on law enforcement is provided later in the Privacy Policy.

### How We Protect Personal Information

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Tsū Social permits you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

### Special Notice for EU Users. How can you exercise your rights provided under the GDPR?

- **Access/Objections to Processing.** Under the General Data Protection Regulation (“GDPR”), you have the right to access, rectify, port and erase your data. You may rectify or update your inaccurate or out of date personal information by going to your account settings and your profile. You may access, object to and restrict certain processing of your data by using this “access request” link for [\[Data Privacy\]](#) or contacting us at the address below. This includes but is not limited to the right to object to our processing of your data for direct marketing or pursuing our or a third parties’ legitimate interests. You may also withdraw your consent when our processing of your data is based on your consent. You can object, withdraw your consent, request we erase and/or exercise your portability right by using this "objection" link for [\[Data Privacy\]](#) or contacting us at the address below.
- **Data retention, account deactivation and deletion.** We store data until we believe it is no longer necessary to the Tsū Social platform and fulfill the purposes described in this Privacy Policy. This is an individualized determination that depends on a number of factors such as the nature of the data, why it is collected, whether you have deleted your account, and relevant legal or operational document and information retention requirements. When we no longer need to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we’ll either remove it from our systems or depersonalize it so that we can’t identify you.

When you delete your account, we will delete your content and posts, and they will no longer be recoverable. Information that others have shared about you isn’t part of your account and won’t be deleted. If you don’t want to delete your account but want to temporarily stop using the Tsū Social platform, you can suspend your account.

- **Complaints.** If you believe that we have not complied with data protection laws, and you are a resident of a European Economic Area Member State, you have the right to lodge a complaint with your local supervisory authority. However, if you have any questions about our data processing activities, or you wish to contact us or notify us regarding accepting service of issues relating to data processing under the GDPR you may contact our [EU Contact/Data Protection Officer](#).

### **How do we respond to legal requests or prevent harm?**

We access, preserve and share your information with law enforcement, governmental agencies, regulators or others:

- In response to a legal request (like a search warrant, court order or subpoena) as we determine required or appropriate.
- When we have a good-faith belief it is necessary to: detect, prevent and address fraud, unauthorized use of the Tsū Social platform, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or service), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.

Information we receive about you (including financial transaction data related to purchases) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for terms violations to prevent repeat abuse or other term violations.

### **How do we operate and transfer data as part of our global services?**

As a global platform we share information globally, both internally and externally with our partners and with those you connect and share with around the world in accordance with this Privacy Policy. Information will be stored and processed in the United States or other countries outside of where you live for the purposes as described in this Privacy Policy. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws of your country. These data transfers are necessary to globally operate and provide the Tsū Social platform to you.

Where we transfer your personal information from the European Economic Area (“EEA”) to a destination in a country outside of the EEA we utilize standard contract clauses, rely on the European Commission’s adequacy decisions about certain countries, as applicable and obtain your consent for these data transfers to the United States and other countries.

For a copy of the standard contractual clauses click this link – <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010D0087>

For a copy of adequacy decisions click this link – [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

### **Special Notice for California Residents**

- This section applies only to California Residents. It explains how we collect, use and share your Personal Information and how to exercise your rights under the California Consumer Privacy Act of 2018.
- **Personal Information Collected.** Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), below is a summary of the personal information categories, as identified and defined by the CCPA (see California Civil Code section 1798.140 (o)), that we collect, the reason we collect

your personal information, where we obtain the personal information, and the third parties that we share your personal information. We collect and share information with third parties for the purposes described in this Privacy Policy.

- **Privacy Rights.** If you are a California resident, you have rights in relation to your personal information; however, your rights are subject to certain exceptions. For instance, the Company cannot disclose specific pieces of personal information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the personal information, your account with us or the security of the business's systems of networks.
- Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. We may request that your authorized agent have written permission from you to make requests on your behalf and may need to verify your authorized agent's identity.
- You have the right to know the personal information we collect, use, and disclose about you during the preceding 12 months.
- You have the right to request in writing from us a copy of the:
  - Categories of information we have collected about you individually
  - The categories of sources from which we collected that information
  - Why we collected that information about you
  - The categories of third parties with whom we shared your personal information
  - The categories of personal information that the business disclosed about you for a business purpose
  - The categories of personal information disclosed to third parties for the third parties' direct marketing purposes during the immediately preceding calendar year
  - The specific pieces of personal information we have collected about you.
- Please note that we are only required to respond twice per calendar year to your right to know.
- You have the right to request that we delete any personal information we have collected from you or maintain about you individually, subject to certain exceptions.
- We will not discriminate against you if you exercise these rights including the right to know, delete or to opt-out of services. To assert your rights please contact [\[Data Privacy\]](#) or contact us at the address below. To verify your identity, we will ask you to login to your account. If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.
- **Right to Opt-Out.** To provide the products or features offered by the Tsū Social platform we must process information about you, including personal information. We share information about you for business purposes with third parties or affiliates in accordance with the CCPA. We do not sell any of your Personal Information, and we never will. To the extent that you do not want us to share your personal information with the third-party in this way, you have the right to opt-out of such sharing. If you would like to no longer have your personal information shared in this way, please contact [\[Data Privacy\]](#) or contact us at the address below. Please note that to the extent you opt-out we may be unable to offer you some of the benefits and services of the Tsū Social platform, particularly Tsū Dollar awards and other benefits which require sharing personal information, to the extent sharing such personal information is necessary to provide you with such benefits or services as a part of Tsū Social's ongoing business relationship with you. If you have further questions, you can contact us by emailing [\[Data Privacy\]](#) or at the address below.

- For purposes of exercising your rights, please note the following regarding how we collect and use your personal information as described in this Policy. This is a summary of the CCPA-related categories of personal information we may have collected about you over the past 12 months, depending on how you use our Tsū Social platform, as well as how we use it and with whom we may have shared it.

<b>Categories of Personal Information we collect may include:</b>	<b>Examples of how Personal Information is used include:</b>	<b>Parties with whom your information may be shared include:</b>
<p>Identifiers;</p> <p>Data with special protections, if you choose to provide it;</p> <p>Commercial information, if you choose to provide it;</p> <p>Photos and face imagery that can be used to create face-recognition templates if you or others choose to provide it and you have the setting turned on.</p> <p>Internet or other electronic network activity information, including content you view or engage with;</p> <p>Location-related information, including precise device location if you choose to allow us to collect it;</p> <p>Audio or visual Information, including photos and videos, if you or others choose to provide it;</p> <p>Professional or employment information, if you choose to provide it;</p> <p>Education information, if you choose to provide it;</p> <p>Financial information, if you choose to provide it; and</p> <p>Information derived from other personal information about you, which could include your preferences, interests, and other information used to personalize your experience.</p>	<p>Providing, personalizing, and improving our Products;</p> <p>Facilitating transactions, providing measurement, analytics, advertising, and other business services;</p> <p>Promoting safety, integrity, and security;</p> <p>Communicating with you;</p> <p>Researching and innovating for social good; and</p> <p>To perform other business purposes.</p>	<p>People and accounts you share and communicate with;</p> <p>People and accounts with which others share or reshare content about you;</p> <p>Apps, websites, and third-party integrations on or using our Products;</p> <p>New owners in the event of a change of ownership or control of all or part of our Products or their assets changes;</p> <p>Partners, including partners who use our analytics services, advertisers, measurement partners, partners offering goods and services in our Products, vendors and service providers, and researchers and academics; and</p> <p>Law enforcement or other third parties in connection with legal requests.</p>

To learn more about submitting a request under this section of the Privacy Policy, please see the How to Contact the Tsū Social Platform with [Questions section below](#).

## **Children**

**Our websites and online services are not intended for children under the age of 17 and we do not knowingly collect or share personal information from children under the age of 17, without parental consent. Children under the age of 17 should not provide their personal information to us. We will notify you of changes to this Privacy Policy**

## **Changes to this Privacy Policy**

We will notify you before we make changes to this Privacy Policy and give you the opportunity to review the revised Privacy Policy before you choose to continue using the Tsū Social platform.

## **Links**

Tsū Social Platform may contain links to other third-party sites that are not governed by this Privacy Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for the privacy practices by third-party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

## **How to contact the Tsū Social Platform with Questions.**

If you have questions about this Privacy Policy, you can contact us by emailing [\[Data Privacy\]](#) or by mail at the address below:

tsu Inc.  
P.O. Box 1061  
Norwalk, CT 06854