

Privacy Policy

August 21, 2013

Updates To This Policy

We will routinely update this Privacy Policy to clarify our practices and to reflect new or different privacy practices, such as when we add new services, functionality or features. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of notice on the Tuangru Website prior to the change becoming effective. You can determine when this Privacy Statement was last revised by referring to the date above.

Introduction

Tuangru is committed to protecting your privacy and to complying with applicable data protection and privacy laws. This Privacy Policy (“Policy”) explains how we process personal data. Throughout this Policy the term “personal data” means information relating to an identified or identifiable individual (i.e. a natural person). “Tuangru” refers to Tuangru Holdings Inc., including its affiliates (also referred to as “we”, “us”, or “our”). This Policy applies for processing of your personal data where Tuangru is the data controller or where we refer to the applicability of this Policy.

We may provide additional privacy information in connection with our products and services through service descriptions and other notices. Such information prevails over this Policy to the extent of any conflict.

By using this website and/or by submitting personal data to Tuangru, you agree to the processing of your personal data as explained in this Policy. If you do not agree with this Policy, please do not use this website or provide Tuangru with your personal data.

What Data Do We Collect?

We collect your personal data typically when you make a purchase, use or register into our products and services or otherwise interact with us. Below are examples of the categories of data we collect.

Your use of our products and services

When you use our products and services your IP-address, access times, the website you linked from, pages you visit, the links you use, the content you viewed and other such information your browser provides us with is automatically collected.

Information you provide us with

We may ask you to provide us with information such as your name, email address, street address, user names and passwords, your consents, preferences and feedback, information relating to your devices, age, gender, postal code and language preferences. Please note that certain non-identifiable information collected from you may become personally identifiable when you provide us with your personal data.

Your transactions with us

We collect information relating to your purchase and use of our products and services and your other interactions with us. Such information may include details of the queries or requests you have made, the products and services provided, delivery details, banking information, credit card details, billing address, credit checks and other such financial information, details of agreements between you and us, records of contacts and communications, information and details relating to the content you have provided us with and other such transactional information. We may, in accordance with applicable law, record your communication with our customer care or with other such contact points.

Why Do We Process Personal Data?

Tuangru may process your personal data for the following purposes. Please note that one or more purposes may apply simultaneously.

Providing products and services

We may use your personal data to provide you with products and services, to process your order or as otherwise may be necessary to perform the contract between you and us, to ensure the functionality and security of our products and services, to identify you as well as to prevent and investigate fraud and other misuses.

Communicating with you

We may use your personal data to communicate with you, for example to send you critical alerts and other such notices relating to our products and/or services and to contact you for customer care related purposes.

Marketing and making recommendations

We may use your personal data to personalize our offering and to provide you with more relevant services, for example, to make recommendations and to display customized content in our services. We may use your personal data for direct marketing or research purposes, for example, to conduct market research and we may, in accordance with applicable law, contact you to inform you of new products, services or promotions we may offer.

Do We Share Personal Data?

We do not sell, lease, rent or otherwise disclose your personal data to third parties unless otherwise stated below.

Authorized third parties

We may share your personal data with authorized third parties who process personal data for Tuangru for the purposes described in this Policy. This may include for example delivery of your purchases, providing services including customer service, managing and analyzing customer data, credit checks, conducting market research and managing marketing and other such campaigns.

We may conduct joint marketing and other communications with our partners. To avoid duplicate or unnecessary communications and to tailor the message to you we may need to match information that Tuangru has collected with information that the partner has collected where this is permitted by law.

These authorized third parties are not permitted to use your personal data for any other purposes. We require them to act consistently with this Policy and to use appropriate security measures to protect your personal data.

Mandatory disclosures

We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties, for example, to law enforcement agencies in the countries where we operate. We may also disclose and otherwise process your personal data in accordance with applicable law to defend Tuangru's legitimate interests, for example, in civil or criminal legal proceedings.

How Do We Address Data Quality?

We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data.

As certain Tuangru products and services may allow you to manage your profile, we encourage you to access your personal data from time to time to ensure that it is correct. Please remember that in case of any changes it is your responsibility to update the personal data you have provided us with.

What Steps Are Taken To Safeguard Personal Data?

Privacy and security are key considerations in the creation and delivery of our products and services. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security engineering, training and assessments. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our databases containing personal data to authorized persons having a justified need to access such information.

How Do We Use Cookies?

Cookies are small text files that are sent to your computer by a web server. We use cookies to provide benefits to you. Session cookies remember the previous activity performed by you, for example an item you placed in a shopping cart. Persistent cookies are used to save your preferences over multiple sessions, for example personalization of settings on our websites. Cookies may be used to display targeted ads and recommendations, for example to eliminate showing the same ads to you multiple times or showing ads that we think are of interest to you based on your past actions on our website. Cookies are also used to determine the

effectiveness of our promotions and advertising campaigns and to improve our products and services.

Most browsers allow you to disable or allow the use of cookies. You may also delete the cookies on your computer if your browser so permits. If you disable cookies, you may not be able to use certain parts of our services.

Contact Us

Please contact us if you have any questions or comments about our privacy practices or this Privacy Policy. You can reach us online at info@tuangru.com.