

CENTSAI PRIVACY POLICY

CentSai, operated by CentSai Inc. (“CentSai”, “we” or “us”) recognizes the importance of your personal privacy. Therefore, we have created this Privacy Policy so that you know how we use and disclose your information when you make it available to us. The Privacy Policy below discloses our practices regarding information collection and usage for the websites located at centsai.com and/or centsaiadulting.com (collectively, the “Service”).

By using or accessing the Service or participating in our services, you signify your agreement to be bound by our Privacy Policy. **IF YOU DO NOT AGREE TO THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE OUR SERVICE OR PARTICIPATE IN OUR SERVICES.**

Key aspects of our privacy practices described in this Privacy Policy include the following explanations:

- The information we collect and why we collect it;
- How we use that information;
- How we share information; and
- The choices we offer.

Personally Identifiable Information That We Collect:

We do not collect personally identifiable information from you unless you voluntarily provide it to us. You may be required to submit certain personally identifiable information when you register on the Service. The personally identifiable information which you may provide to us could include, without limitation:

- Your name;
- Your gender;
- Your date of birth;
- Your contact information (including address, email address and phone number);
- Payment information; and
- Other personally identifiable information.

Non-Personal Or Aggregate Information That We Collect:

When you access our Service or use the CentSai services, we may automatically collect non-personally identifiable information from you, such as IP host address, web pages viewed, browser type, operating system, referring service, search information, device type, page views, usage and browsing habits on the Service and similar data. We may also aggregate demographic information collected from our users (such as the number of users in a particular state) in a manner which does not identify any one individual. We may also aggregate information collected offline in connection with the Service or use of our services, obtain non-personally identifiable information from third party sources and

develop aggregate information by anonymizing previously collected personally identifiable information.

It is possible at times when collecting non-personally identifiable information through automatic means that we may unintentionally collect or receive personally identifiable information that is mixed in with the non-personally identifiable information. While we will make reasonable efforts to prevent such incidental data collection, the possibility still exists. If you believe that we have inadvertently collected your personal information, please notify us at support@centsai.com.

Information Usage:

We will only use your personally identifiable information as described below, unless you have specifically consented to another type of use, either at the time the personally identifiable information is collected from you or through some other form of consent from you or notification to you:

- We may share your personally identifiable information collected in connection with providing the Service.
- We may use your personally identifiable information to respond to your inquiries or requests.
- We may use your personally identifiable information to send you emails from time to time about our services, but we will not provide your personally identifiable information to third parties for them to contact you directly unless otherwise permitted by this Privacy Policy or you provide your consent.
- We may permit our vendors and subcontractors to access your personally identifiable information, but they are only permitted to do so in connection with performing services for us. They are not authorized by us to use the information for their own benefit.
- We may share your personally identifiable information with third parties to further the purpose for which you provided such information to us. For example, but without limitation, we may share your information with our email vendor, as necessary for sending emails to you; or with our payment processor, as necessary for processing your purchases made online via the Service; or with identity verification services, as necessary to confirm your identity. **We urge you to read the privacy practices of our email vendor and payment processor, as well as those of any other third parties, before submitting any personal information through the Service.**
- We may disclose personally identifiable information as required by law or legal process.
- We may disclose personally identifiable information to investigate suspected fraud, harassment or other violations of any law, rule or regulation, or the terms or policies for our services or our sponsors.
- We may transfer your personally identifiable information in connection with the sale or merger or change of control of CentSai or the division responsible for the services with which your personally identifiable information is associated.

- We may share your personally identifiable information with an affiliate of CentSai who is in the same corporate family as us as long as their privacy practices are substantially similar to ours.

Non- personally identifiable or aggregate information may be used by us for any purposes permitted by law and may be shared with any number of parties, provided that such information shall not specifically identify you.

Cookies and Similar Technologies:

“Cookies” are pieces of information that may be placed on your computer by a service for the purpose of facilitating and enhancing your communication and interaction with that service. Many services use cookies for these purposes. We may use cookies (and similar items such as clear gifs, web beacons, tags, etc.) on our Service to customize your visit and for other purposes to make your visit more convenient or to enable us to enhance our Service. We may also use and place cookies (and similar items) on your computer from our third party service providers in connection with the Service, such as an analytics provider that helps us manage and analyze Service usage, as described more fully below. In addition, our advertisers and business partners may set cookies and similar items on your computer when you use our Service. You may stop or restrict the placement of cookies on your computer or flush them from your browser by adjusting your web browser preferences, in which case you may still use our Service, but it may interfere with some of its functionality. Cookies and similar items are not used by us to automatically retrieve personally identifiable information from your computer without your knowledge.

If you delete your cookies, change browsers or use a different cookie, our cookie (or an opt-out cookie) may no longer work and you will have to reinput (or opt-out) again.

Security:

The security of your personally identifiable information is very important to us. When we collect your personally identifiable information online, we use reasonable efforts to protect it from unauthorized access. However, due to the inherent open nature of the Internet, we cannot guarantee that your personally identifiable information will be completely free from unauthorized access by third parties such as hackers and your use of our Service and CentSai services demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your personally identifiable information. For more information on protecting your privacy, please visit www.ftc.gov/privacy.

Your Disclosures In Blogs And Other Social Media:

You should be aware that personally identifiable information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum such as an in-person panel or survey, may be viewed and used by others without any restrictions. We are unable to control such uses of your personally identifiable information, and by using such services you assume the risk that the personally identifiable information provided by you may be viewed and used by third parties for any number of purposes.

If you choose to connect with a social networking service, such as Facebook, we may share information with that service, and that service may share information about you with us.

Protection for Children:

We do not ask children to provide any personally identifiable information while using the Service. In compliance with the Children’s Online Privacy Protection Act, however, we obtain the consent of parents in order for children under 13 years of age (“Children” or “Child”) to use the Service in any manner that could result in the Child submitting personally identifiable information to the Service. Additionally, we may link certain information collected through a variety of technologies that automatically collect certain information whenever a Child interacts with the Service. To the extent permitted by law, we may also share a Child’s personally identifiable information:

- With our service providers.
- With a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

CentSai Inc., located in the United States of America, is the operator of this Website. Questions regarding this Privacy Policy and issues related to your Children’s personally identifiable information should be directed to us via any of the following methods:

- Mailing address: 455 7th Street, Brooklyn, NY 11215, Attention: General Counsel
- Telephone number: +1 (917) 746-0707 (General Counsel)
- E-mail address: support@centsai.com.

Other Services:

As a convenience to you, we may provide links to third-party Services from within our Service. We are not responsible for the privacy practices or content of these third-party sites. When you link away from our Service, you do so at your own risk.

Changes to this Privacy Policy:

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. However, if at any time in the future we plan to use personally identifiable information in a way that materially differs from this Privacy Policy, including sharing such information with more third parties, we will post such changes here and provide you the opportunity to opt-out of such differing uses. Your continued use of the Service and our services following the posting of any changes to this Privacy Policy means you accept such changes.

Opt-Out Process:

All unsubscribe or opt-out requests should be sent to us at unsubscribe@centsai.com and we will process your request within a reasonable time after receipt. However, we are not responsible for, and in some cases we are incapable of, removing your personally identifiable information from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy or your consent. You should contact such third parties directly. If you would like to update or correct any personally identifiable information that you have provided to us, please email us at support@centsai.com and once we confirm your information, we will update such information within a reasonable amount of time.

Communications with CentSai:

By providing your email address to us, you expressly consent to receive emails from us. We may use email to communicate with you, to send information that you have requested or to send information about other products or services developed or provided by us or our business partners, provided that, we will not give your email address to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

By providing your phone number to us, you expressly consent to receive phone calls and/or text messages from us. We will not give your phone number to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

Any phone calls and/or text messages delivered to your phone or device may cause you to incur extra data, text messaging, or other charges from your wireless carrier. MESSAGE AND DATA RATES MAY APPLY. You are solely responsible for any carrier charges incurred as a result of phone and/or text communications from CentSai.

Any communication or material you transmit to us by email or otherwise, including any data, questions, comments, suggestions, or the like is, and will be treated as, non-confidential and nonproprietary. Except to the extent expressly covered by this Privacy Policy, anything you transmit or post may be used by us for any purpose, including but not limited to, reproduction, disclosure, transmission, publication, broadcast and posting. Furthermore, you expressly agree that we are free to use any ideas, concepts, know-how, or techniques contained in any communication you send to us, as well as any data developed using the content of such communication, without compensation and for any purpose whatsoever, including but not limited to, developing, manufacturing and marketing products and services using such information.

No Rights of Third Parties:

This Privacy Policy does not create rights enforceable by third parties, nor does it require disclosure of any personal information relating to users of the Service.

Service Terms and Conditions:

Use of this Service is governed by, and subject to, the Terms and Conditions located at www.centsai.com/content/terms-conditions.pdf. This Privacy Policy is incorporated into such terms. Your use, or access, of the Service constitutes your agreement to be bound by these provisions. IF YOU DO NOT AGREE TO THESE TERMS AND CONDITIONS YOU MAY NOT ACCESS OR OTHERWISE USE THE SERVICE.

United States of America:

Our servers are maintained in the United States of America. By using the Service or participating in CentSai services, you freely and specifically give us your consent to export your personally identifiable information to the USA and to store and use it in the USA as specified in this Privacy Policy. You understand that data stored in the USA may be subject to lawful requests by the courts or law enforcement authorities in the USA.

Governing Law:

This Privacy Policy and our legal obligations hereunder are subject to the laws of Delaware, U.S.A., regardless of your location. You hereby consent to the exclusive jurisdiction of and venue in the federal and state courts located in Kent County, Delaware, U.S.A. in all disputes arising out of or relating to the Services.

Contact:

For questions or concerns relating to privacy, we can be contacted at: support@centsai.com.

Effective Date:

This Privacy Policy was last updated on July 6, 2016.