

Privacy Notice

How personal data is used across the Provider's courses, communities and sessions.

Provider	Kendrick Debono
Effective date	30 August 2026
Contact	symmful@gmail.com

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1. Controller and scope

Kendrick Debono, 41, Triq it-Torri, Msida MSD 1827, Malta, is the controller responsible for personal data processed in connection with the Services. Contact: symmful@gmail.com. This Notice applies across the Brand Names Kendrick, Kendrick Trades, Symmful, Symmful Trades, Premium, Playbook, Scalper's Code and Scalper's Code Playbook and connected Whop, Discord, Zoom, email, course and community experiences. Third-party platforms also process data under their own notices.

2. Information we collect

- **Identity and account data:** name, username, account IDs, age confirmation, profile image and authentication information supplied by a platform.
- **Contact data:** email address, postal address where required, and communications preferences.
- **Transaction data:** product, plan, price, currency, payment status, renewal, cancellation, refund and chargeback information. We generally receive payment tokens or status, not full card numbers.
- **Usage and technical data:** log-in time, accessed lessons, completion, clicks, device/browser information, IP address, approximate location, referral information and security logs.
- **Community and session data:** posts, reactions, questions, moderation history, support messages, voice/video contributions and recordings where applicable.
- **Content-protection data:** account-linked watermark identifiers, download/access history and evidence of suspected unauthorised sharing.
- **Preference and feedback data:** surveys, testimonials, interests and feedback you choose to provide.

3. Sources of information

We receive information directly from you; automatically from your use of the Services; from Whop, Discord, Zoom, payment and authentication providers; from moderators and support personnel; and from lawful public or third-party sources when investigating fraud, threats or infringement.

4. Purposes and legal bases

- **Contract:** create and administer access, take payment, deliver Content and sessions, provide support, manage renewals, cancellations and service messages.
- **Legitimate interests:** secure accounts, prevent piracy and fraud, moderate communities, keep operational records, improve Services, understand engagement, establish or defend legal claims and communicate with existing members about closely related Services. We balance these interests against your rights.
- **Consent:** send marketing where consent is required, use optional testimonials or publicity, and process optional recording participation where consent is the appropriate basis. You may withdraw consent prospectively.
- **Legal obligation:** comply with tax, accounting, consumer, regulatory, court and law-enforcement requirements.
- **Vital interests/public task:** only in exceptional circumstances where legally applicable.

5. Special-category and financial information

We do not need your brokerage credentials, account balance, exact portfolio or government identity documents merely to provide ordinary educational access. Do not post such information in community channels. If you voluntarily reveal health, political, biometric or other special-category data, we will restrict or remove it where reasonably possible and process it only with an appropriate legal basis.

Payment processing is handled by platform/payment providers. Never send full card details in chat or email.

6. Sharing and processors

We disclose only information reasonably necessary for the relevant purpose. Recipients may include Whop; Discord; Zoom or another session provider; payment, fraud-prevention, hosting, storage, email, analytics and customer-support providers; professional advisers; moderators and contractors subject to confidentiality; a lawful business successor; and courts, regulators or law-enforcement bodies where legally required.

Community posts and profile information are visible to other members according to the channel and platform settings. We do not sell personal data for money. We require processors acting for us to use data only on documented instructions and with appropriate safeguards.

7. International transfers

Some providers or community participants may be outside Malta or the European Economic Area. Where we control a restricted transfer, we use an adequacy decision, approved contractual safeguards such as Standard Contractual Clauses, or another lawful mechanism, together with supplementary measures where appropriate. You may request information about applicable safeguards.

8. Recordings and community visibility

Official sessions may be recorded after notice. Recordings can include display names, voices, video, chat and shared screens. We use them to deliver replays, maintain records, investigate incidents and improve education. Participation controls may include keeping camera and microphone off or using chat. Do not disclose third-party confidential or personal information.

Discord and similar spaces are group environments. Treat anything you post as visible to the intended channel audience and potentially capable of being copied by others despite our rules.

9. Watermarking, security and fraud prevention

Course video may contain a visible or forensic watermark linked to the accessing account. The purpose is to deter redistribution, identify likely sources of leaked Content, enforce licences and protect members and the Provider. We limit the identifier displayed where reasonably possible and restrict access to mapping records.

We may review access patterns, IP/device signals, concurrent sessions, reports and copies found online to detect account sharing or infringement. We do not make solely automated decisions producing legal or similarly significant effects without the safeguards required by law. Affected users may request human review.

10. Cookies and platform technologies

Connected platforms may use cookies, local storage, SDKs and similar technologies for authentication, preferences, security, performance and analytics. Their controls and notices apply on their services. Where we directly operate a website requiring consent for non-essential technologies, we will provide an appropriate consent control.

11. Retention

We retain data only as long as reasonably necessary for the purposes described, taking account of contract duration, access commitments, legal limitation periods, tax/accounting duties, disputes and security needs. Typical operational targets are: account and contract records for the membership plus up to six years; transaction/tax records for the period required by Maltese law; routine support and moderation records generally up to three years; security and access logs generally up to twelve months unless an incident requires longer; marketing records until opt-out plus a suppression record; and recordings for as long as they remain part of the purchased curriculum or are reasonably needed for the stated purpose.

Backups may persist for a limited rotation period. Data relevant to a dispute, chargeback, fraud or infringement may be preserved until the matter and applicable limitation period end. We securely delete or anonymise data when no longer needed.

12. Your data-protection rights

- Request access to your personal data and information about its processing.
- Request correction of inaccurate or incomplete data.
- Request erasure where the legal conditions are met.
- Request restriction of processing in specified circumstances.
- Object to processing based on legitimate interests and object at any time to direct marketing.
- Receive eligible data in a structured, commonly used and machine-readable format and transmit it to another controller.
- Withdraw consent prospectively without affecting earlier lawful processing.
- Request safeguards relating to qualifying automated decisions and lodge a complaint with a supervisory authority.
- Send a request to symmful@gmail.com. We may verify identity proportionately. We normally respond within one month, subject to lawful extensions. Rights are not absolute; where an exemption applies, we will explain the reason unless law prevents us.

13. Marketing communications

You can unsubscribe through the message link or contact us. Service, payment, security and legal notices are not marketing and may still be sent while relevant. We maintain a minimal suppression record to respect opt-outs.

14. Security

We use reasonable administrative, contractual and technical safeguards appropriate to risk, including access controls, reputable service providers, account security practices, restricted moderation permissions and incident response. No online system is completely secure. You must protect your credentials and promptly report suspected compromise.

15. Children

The Services are for adults aged 18 or older and are not directed to children. We do not knowingly provide membership to or intentionally collect data from minors. If you believe a minor has supplied data, contact us so we can investigate and delete it where appropriate.

16. Automated decisions

We may use rules or signals to flag suspected fraud, account sharing or abuse. Material enforcement decisions should involve human assessment where required. You may contact us to contest a decision, provide context and request review.

17. Changes

We may update this Notice to reflect legal, technical or operational changes. We will display the new effective date and provide additional notice where a material change requires it. A new purpose incompatible with the original purpose will be supported by an appropriate legal basis and notice.

18. Complaints and contact

Questions and rights requests: **symmful@gmail.com**. Postal contact: **41, Triq it-Torri, Msida MSD 1827, Malta**. You may complain to the Office of the Information and Data Protection Commissioner in Malta or, where applicable, your local EEA supervisory authority. We encourage you to contact us first so we can try to resolve the issue.