HalePath

PRIVACY POLICY

Effective date: 25 September 2026

This Privacy Policy explains how HalePath handles personal information when you buy or use our digital products, participate in our Whop community, contact support, or interact with HalePath pages where this Policy is displayed.

HalePath provides practical digital health and wellness education, guides, tools, templates, community features, and related digital services. In this Privacy Policy ("Policy"), "HalePath," "we," "us," and "our" refer to the seller operating the HalePath brand and storefront. "You" and "your" refer to a customer, visitor, member, or other person who interacts with HalePath.

HalePath currently uses Whop to host its storefront, product access, community spaces, support features, and checkout experience. Whop separately processes personal information under its own privacy policy and platform terms. This Policy describes HalePath's own handling of personal information and does not replace Whop's privacy policy for information Whop processes independently.

1. Scope of This Policy

This Policy applies to personal information HalePath receives or collects in connection with:

- purchases of HalePath digital products and access to HalePath product areas on Whop;
- HalePath community announcements, community chat, support chat, and other member interactions;
- refund, access, account, support, and product-use requests directed to HalePath;
- HalePath landing pages, websites, forms, or other channels that display or link to this Policy; and
- feedback, surveys, testimonials, or similar information that you choose to provide to HalePath.

This Policy does not govern Whop's independent collection or use of information for account creation, platform security, payments, financial compliance, advertising, analytics, or other Whop services. Please review Whop's Privacy Policy at whop.com/privacy for those practices.

2. Personal Information We May Receive or Collect

2.1 Information received through Whop

When you purchase or access a HalePath product through Whop, HalePath may receive information that Whop makes available to sellers for fulfillment and support. Depending on your interaction and Whop settings, this may include:

- your name, display name, username, or other account identifier;
- your email address or other contact information made available for the transaction or support;
- confirmation of your purchase, the product purchased, purchase date, access status, and related transaction information;
- limited account or profile information needed to provide access, support, or community features; and
- refund, dispute, or account-status information relevant to servicing your purchase.

2.2 Information you provide directly to HalePath

We may collect information you voluntarily provide when you contact support, post in a community area, ask a question, request a refund, submit feedback, respond to a survey, or otherwise communicate with us. This may include the content of your message, attachments you choose to send, and the contact information associated with the communication.

2.3 Payment information

HalePath does not directly process or store your full payment-card or bank-account credentials when you pay through Whop checkout. Payments are handled by Whop and its financial or payment partners under their own terms and privacy practices. HalePath may receive transaction confirmation and limited billing or receipt information needed to administer your purchase, refunds, or customer support.

2.4 Health and other sensitive information

HalePath products concern health, wellness, fitness, recovery, and related topics, but HalePath does not require medical records, diagnoses, prescription information, or other highly sensitive health information in order to deliver its digital products. Please avoid posting or sending sensitive medical information in community or support channels unless it is genuinely necessary for your request.

If you voluntarily share health-related information with HalePath, we will use it only as reasonably necessary to respond to your request, provide support, maintain safety, or meet legal obligations. HalePath does not use voluntarily submitted health information for unrelated advertising.

3. How We Use Personal Information

HalePath may use personal information for the following purposes:

- to confirm purchases and provide access to the digital products, files, resources, and community features you purchased;
- to respond to support questions, access issues, refund requests, feedback, and other communications;
- to administer HalePath community spaces, enforce community standards, and address misuse, fraud, security issues, or abuse;
- to send service-related notices about your purchase, material product updates, policy changes, or important account information;
- to improve HalePath products, instructions, customer experience, and support using feedback and, where practical, aggregated or de-identified information;
- to maintain business, transaction, accounting, tax, dispute, and compliance records;
- to establish, exercise, or defend legal rights and comply with lawful requests; and
- to send optional promotional communications only where permitted by law and subject to your available choices.

4. Legal Bases for Processing

Where data-protection law requires HalePath to identify a legal basis, the basis will depend on the context. We may process personal information because it is necessary to perform our contract with you, because we have a legitimate interest in operating and improving HalePath, because you have given consent, or because processing is necessary to comply with a legal obligation.

Where we rely on consent, you may withdraw that consent at any time for future processing. Withdrawal does not affect processing that was lawful before withdrawal.

5. How We Share Personal Information

HalePath does not sell or rent your personal information. We may disclose personal information only where reasonably necessary for the purposes described in this Policy, including to:

- Whop and its platform, financial, payment, security, or support partners where necessary to provide the storefront, checkout, product access, refunds, dispute handling, or platform services;
- service providers or contractors that help HalePath operate its website, communications, customer support, document delivery, analytics, or business systems, subject to appropriate confidentiality or data-protection obligations;
- professional advisers such as accountants, lawyers, auditors, insurers, or consultants where reasonably necessary;
- government authorities, regulators, law enforcement, courts, or other parties when required by law or reasonably necessary to protect rights, safety, or security; and
- a buyer, successor, or adviser in connection with a genuine business transfer, restructuring, merger, or sale, subject to appropriate safeguards.

HalePath does not disclose personal information to third parties for their own unrelated direct marketing merely because you purchased a HalePath product.

6. Whop, Checkout, and Payment Processing

Whop is a separate platform provider with its own privacy and security responsibilities. HalePath relies on Whop for customer accounts, checkout, payment processing interfaces, product access, community features, and related platform services. Whop may collect information directly from you and may share certain buyer information with HalePath to complete a purchase and provide the product you purchased.

Questions about HalePath product content, access, support, or a HalePath refund request should be directed to HalePath. Questions relating solely to Whop account data, Whop platform privacy, or payment-processing activity controlled by Whop should be directed to Whop under its published policies and support channels.

7. Cookies, Analytics, and External HalePath Pages

The HalePath community and checkout experience currently operates primarily through Whop, which may use cookies, device information, analytics, and similar technologies under Whop's own Privacy Policy.

If HalePath operates an external landing page or website, the hosting provider may process basic technical information necessary to deliver and secure the page, such as browser, device, request, and security-log information. If HalePath introduces non-essential analytics, advertising pixels, or similar tracking technologies that require notice or consent, we will provide the required choices and update this Policy as appropriate.

8. Community Posts and Public or Member-Visible Content

Content you post in HalePath community areas may be visible to other members with access to that area. This can include your display name, profile image, comments, questions, replies, and any information you choose to include in a post. Please do not post information that you do not want other members to see.

Although HalePath may moderate or remove content where appropriate, other members may copy, quote, screenshot, or otherwise retain information you choose to share. HalePath cannot guarantee deletion of copies independently retained by other users.

9. Marketing and Communications

HalePath may send transactional or service communications that are necessary to administer your purchase or product access. Promotional messages, where used, will be sent only where permitted by applicable law. You may opt out of promotional communications using the unsubscribe method provided or by contacting HalePath support. Service-related communications may still be sent where necessary.

10. Data Retention

We retain personal information only for as long as reasonably necessary for the purposes described in this Policy, including providing product access and support, maintaining transaction and accounting records, handling refunds or disputes, complying with legal obligations, enforcing agreements, and protecting legal rights.

Retention periods may vary depending on the type of information and applicable law. Information held independently by Whop is subject to Whop's own retention practices. A request to HalePath does not automatically delete information maintained by Whop, and you may need to submit a separate request to Whop.

11. Data Security

HalePath uses reasonable administrative, organizational, and technical measures appropriate to the nature of the information we handle. We also rely on Whop and other service providers for platform and infrastructure security where they process information on our behalf or as independent providers.

No online service, transmission method, or storage system can be guaranteed to be completely secure. You are responsible for keeping your Whop login credentials secure and for notifying the relevant platform promptly if you suspect unauthorized access to your account.

12. International Processing and Transfers

HalePath may serve customers in multiple countries. Whop and other service providers used to deliver HalePath services may process information in countries other than the country where you live. Where required by applicable law, appropriate safeguards will be used for international transfers of personal information.

13. Your Privacy Rights and Choices

Depending on where you live, you may have rights regarding your personal information. These may include the right to:

- request access to or a copy of personal information HalePath holds about you;
- request correction of inaccurate or incomplete information;
- request deletion of personal information, subject to legal and legitimate retention requirements;
- request restriction of certain processing or object to certain processing;
- receive certain information in a portable format where applicable;
- withdraw consent where processing is based on consent;
- opt out of promotional communications; and

- lodge a complaint with an appropriate data-protection authority where that right applies.

HalePath does not sell personal information or use personal information for HalePath-controlled cross-context behavioural advertising. If our practices change, we will update this Policy and provide any opt-out rights required by applicable law.

To exercise a right relating to information controlled by HalePath, contact us using the method in Section 17. We may need to verify your identity before completing a request. Rights relating to information controlled independently by Whop should be submitted directly to Whop.

14. Children and Minors

HalePath products are intended for adults and are not directed to children under 18. HalePath does not knowingly seek personal information from children. If you believe a child has provided personal information to HalePath inappropriately, please contact us so that we can take appropriate action, subject to legal requirements and platform controls.

15. Third-Party Links and Services

HalePath content may link to Whop or other third-party websites, services, tools, or resources. Those third parties have their own privacy practices. HalePath is not responsible for the privacy practices of third parties, and you should review their policies before providing personal information to them.

16. Changes to This Privacy Policy

We may update this Policy from time to time to reflect changes in HalePath products, technology, service providers, legal requirements, or business practices. The revised Policy will show a new effective date. Where required by law, or where a change is material, we will provide additional notice through the HalePath storefront, community, email, or another reasonable channel.

17. Contact HalePath

For privacy questions, requests, or concerns relating to HalePath's own handling of personal information, please contact HalePath through the Support Chat available in the HalePath Whop space. If you cannot access Support Chat, use the current seller contact method shown on your Whop purchase receipt or HalePath storefront.

For questions concerning Whop's independent collection, account information, platform privacy practices, or payment-processing data, contact Whop through its published privacy and support channels.

HalePath is committed to using personal information in a practical, proportionate, and transparent way that supports the products and services customers choose to use.