THE ALPHA CLUB INC.

PRIVACY POLICY

Effective Date: April 11, 2026 | Last Updated: November 20, 2026

1. Scope

This Privacy Policy ("Policy") describes how The Alpha Club Inc., a British Columbia corporation (Corp. No. BC1549628), with its head office at 112 – 970 Burrard Street, Vancouver, BC, Canada, V6Z 2R4 ("Company," "we," "us," or "our"), collects, uses, shares, and protects your personal information when you access our websites, purchase our services, or participate in our community platforms.

For members enrolled in the Private Mentorship program, the signed Mentorship Agreement also applies.

2. Information We Collect

2.1 Information You Provide

- Account Information: Name, email address, Discord username, account identifiers, and a phone number if you give us one.
- Payment Information: Subscription history, purchase records, and payment confirmations. We do not store full payment card numbers. Payment processing is handled by Whop, which acts as our Merchant of Record, and its third-party payment processors (including Stripe).
- Communication Data: Messages, emails, and support requests you send to us.
- Mentorship Onboarding Information: What you tell us when you join the Private Mentorship, such as your trading experience, goals, schedule, starting capital, and past trading losses.
- Mentorship Program Records: Your speed journals, psych sheets, the entry size you confirm to us in writing, and your signed agreement, including the record of who signed and when.
- Wallet Data: The trading wallet address you give us when you join the Private Mentorship. We review only publicly available on-chain transaction data for that wallet, during the program and the guarantee period, to follow your progress and to verify the conditions of the mentorship guarantee. We do not access, control, or transfer any funds. When linked to your identity, wallet transaction data is treated as personal financial information and protected accordingly.
- Results and Testimonials: Results, quotes, or feedback you share with us. We use these in marketing only with your consent.

2.2 Information Collected Automatically

- Usage Data: IP address, device type, browser type, operating system, pages visited, and timestamps when you interact with our websites or platforms.
- Participation Data: Session attendance records and course completion records.
- Recording Data: Audio recordings of group trading sessions, voice chat sessions, and community events. Recording is disclosed at the time you join these sessions, and by participating you consent to it.
- Cookies and Similar Technologies: We may use cookies and similar technologies for functionality and analytics. You may disable cookies in your browser settings, though certain features may not function properly.

2.3 Information from Third Parties

We may receive information from the platforms you use to access our services, including Whop (purchase and subscription data) and Discord (username and community participation data).

3. How We Use Your Information

- To provide and manage your subscription, course access, community membership, or mentorship.
- To process payments through our Merchant of Record and its payment processors.
- To track course completion, session attendance, journal submissions, and on-chain wallet activity for program delivery and the mentorship guarantee.
- To record group sessions for quality assurance, education, and dispute resolution.
- To communicate with you about your account, support requests, policy updates, or service changes.
- To enforce our Terms of Service and community conduct rules.
- To detect and prevent fraud, abuse, chargebacks, and policy violations.
- To comply with legal obligations and lawful requests from authorities.
- To improve our services and educational content.

We do not use your personal information for unrelated purposes without your consent.

Marketing communications. Where you have consented or as otherwise permitted by law, we may send you messages about our products, offers, and updates. Every marketing message includes an unsubscribe option, and opting out does not affect the service messages needed to administer your account.

4. Consent and Legal Bases

We collect, use, and disclose your personal information with your knowledge and consent, except where permitted or required by law. By using our services and providing your personal information, you consent to the collection, use, and disclosure described in this Policy. You may withdraw your consent at any time by contacting the Privacy Officer. Withdrawal may affect our ability to provide certain services, and we will tell you the consequences before you proceed.

Where the laws of the United Kingdom or the European Economic Area apply, we rely on one or more of the following legal bases: performance of a contract with you; your consent; our legitimate interests, such as securing our services, preventing fraud, and improving our offerings; and compliance with legal obligations.

5. How We Share Your Information

We do not sell your personal information. We share personal information only as necessary for the purposes described in this Policy, with:

- Payment Providers: Whop (our Merchant of Record) and its payment processors, including Stripe, to process payments and refunds.
- Community Platforms: Discord, to deliver community services including direct messages, voice channels, and group sessions.
- Service Providers: the tools we use to run our services, such as electronic signature, forms and spreadsheets, email, call booking, website, marketing, and analytics tools.
- Team Members and Contractors: people who help us deliver our services, subject to confidentiality obligations.

- Legal Authorities: when required by law, regulation, court order, or lawful request.
- Professional Advisors: legal, accounting, and other advisors retained by the Company, subject to confidentiality obligations.
- Successor Entities: in the event of a merger, acquisition, or sale of substantially all of the Company's assets, with notice to affected individuals.

Each third-party provider operates under its own privacy policy.

6. International Data Transfers

We are based in Canada and use third-party platforms based in the United States and other countries. Your personal information may be transferred to, stored in, and processed in jurisdictions outside your own. We rely on the data protection terms and safeguards offered by our service providers for these transfers.

7. Data Retention

We keep personal information for as long as there is a business or legal reason to keep it, such as delivering our services, administering the mentorship guarantee, resolving disputes, and meeting tax and record-keeping obligations. You may ask us to delete your personal information, and we will do so where the law allows. Blockchain transaction data is publicly accessible on-chain and cannot be deleted by the Company or any party.

8. Security and Breach Notification

We use reasonable administrative, technical, and organizational safeguards to protect personal information. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. You are responsible for the security of your own wallet private keys and account credentials.

If a breach of security safeguards involving personal information under our control poses a real risk of significant harm, we will notify affected individuals within 72 hours of becoming aware of the breach and report it to the regulators the law requires.

9. Your Rights and Complaints

Regardless of where you live, you may ask to access the personal information we hold about you, correct inaccurate or incomplete information, delete your personal information where legally permitted, and withdraw your consent, subject to legal or contractual restrictions. If you are in the United Kingdom or the European Economic Area, you also have the right to restrict or object to certain processing and the right to data portability. California residents may ask us to disclose the categories of personal information we collect and to delete it, subject to legal exceptions.

To exercise any of these rights or to make a complaint, contact the Privacy Officer. We respond to verified requests within 30 days. If you are not satisfied, you may contact the applicable regulator:

- British Columbia: Office of the Information and Privacy Commissioner for BC (oipc.bc.ca).
- Elsewhere in Canada: Office of the Privacy Commissioner of Canada (priv.gc.ca).
- United Kingdom: Information Commissioner's Office (ico.org.uk).
- European Economic Area: your local Data Protection Authority.
- California: California Privacy Protection Agency or Attorney General (oag.ca.gov).

10. Children’s Privacy

Our services are not directed to individuals who have not reached the age of majority in their jurisdiction of residence (19 in British Columbia, 18 in most US states). We do not knowingly collect personal information from minors. If we become aware that we have, we will delete it promptly.

11. Third-Party and Affiliate Links

Our services contain links to third-party websites and platforms, and some are affiliate links. If you use an affiliate link, the third party may record that you were referred by us. We are not responsible for the privacy practices of any third party.

12. Changes to This Policy

We may update this Policy from time to time. For material changes, we will notify you by email or through the Whop platform at least 30 days before they take effect. Non-material changes may be made at any time without advance notice.

13. Governing Law

This Policy is governed by the laws of the Province of British Columbia and the federal laws of Canada applicable therein, without prejudice to mandatory data-protection rights you may have under the laws of your home jurisdiction.

14. Privacy Officer and Contact

Matt Wayne, Privacy Officer, The Alpha Club Inc., 112 – 970 Burrard Street, Vancouver, BC, Canada, V6Z 2R4. Email: mattwayneconcepts@gmail.com. The Privacy Officer receives and responds to privacy questions, access and correction requests, and complaints.