

# THE ALPHA CLUB INC.

## PRIVACY POLICY

Effective Date: April 11, 2026 | Last Updated: May 31, 2026

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### 1. Introduction and 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, discloses, stores, and safeguards your personal information when you access our websites, purchase our services, or participate in our community platforms.

This Policy has been developed in compliance with the Personal Information Protection Act (British Columbia) ("PIPA") and the Personal Information Protection and Electronic Documents Act (Canada) ("PIPEDA"). Where applicable, it also addresses the rights of individuals in the European Economic Area under the General Data Protection Regulation ("GDPR") and residents of California under the California Consumer Privacy Act ("CCPA/CPRA"). This Policy operates alongside our Terms of Service, End User License Agreement, Refund and Return Policy, and Earnings & Results Disclaimer. For members enrolled in the Private Mentorship program, the signed Mentorship Agreement also applies.

### 2. Privacy Officer

In accordance with PIPA, The Alpha Club Inc. has designated the following individual as its Privacy Officer, responsible for ensuring compliance with this Policy and applicable privacy legislation:

**Matt Wayne, Privacy Officer**

Email: mattwayneconcepts@gmail.com

The Privacy Officer receives and responds to privacy complaints, access requests, correction requests, and any questions about our privacy practices. If you are located in the European Economic Area, you may contact the Privacy Officer to exercise your rights under the GDPR.

### 3. Information We Collect

#### 3.1 Information You Provide

- **Account Information:** Name, email address, Discord username, and account identifiers provided during registration.
- **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), in accordance with their own security standards and data protection terms.
- **Communication Data:** Messages, emails, and support requests you send to us.
- **Wallet Data:** Publicly available blockchain wallet addresses voluntarily submitted to verify eligibility under the mentorship \$20,000 profit guarantee. To verify a guarantee claim, you provide your trading wallet address(es) and we review only publicly available on-chain transaction data. We do

not access, control, or transfer any funds. When linked to your identity through this process, wallet transaction data is treated as personal financial information and protected accordingly.

### 3.2 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.
- **Community and Participation Data:** Session participation and attendance records, course completion logs, and journal submissions used for program delivery and, where applicable, mentorship guarantee compliance.
- **Recording Data:** Audio recordings of group trading sessions, voice chat sessions, and community events recorded for quality assurance and educational purposes. Recording is disclosed at the time you join these sessions, and by participating you consent to such recording.
- **Cookies and Similar Technologies:** We may use cookies and similar technologies to improve functionality and for analytics. You may disable cookies in your browser settings, though certain features may not function properly.

### 3.3 Information from Third Parties

We may receive information from third-party platforms you use to access our services, including Whop (purchase and subscription data) and Discord (username and community participation data). Each third-party platform operates under its own privacy policy.

## 4. How We Use Your Information

We use the personal information we collect for the following purposes:

- To provide and manage your subscription, course access, and community membership.
- To process payments through our Merchant of Record and its payment processors.
- To verify eligibility for the mentorship \$20,000 profit guarantee, including reviewing publicly available on-chain wallet data.
- To track course completion, session attendance, and journal submissions for program delivery and guarantee compliance.
- To record group sessions for quality assurance and educational purposes.
- To communicate with you regarding 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, platform functionality, 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 commercial electronic messages about our products, offers, and updates. In accordance with Canada's Anti-Spam Legislation (CASL) and applicable laws such as the U.S. CAN-SPAM Act, every marketing message includes an unsubscribe option, and you may opt out of marketing communications at any time without affecting service-related messages necessary to administer your account.

We do not use your personal information for automated decision-making that produces legal or similarly significant effects about you.

## 5. Legal Bases for Processing

Where the GDPR applies to our processing of your personal data, we rely on one or more of the following legal bases: (a) performance of a contract with you, to deliver the services you purchase; (b) your consent, for example where you submit a wallet address or participate in a recorded session; (c) our legitimate interests, such as securing our services, preventing fraud, and improving our offerings, provided these are not overridden by your rights; and (d) compliance with legal obligations.

If you are located in Canada, personal information is processed in accordance with PIPEDA and PIPA, based on informed consent, limited collection, and purpose limitation.

## 6. Consent

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 inform you of the consequences before you proceed. In some cases consent may be implied — for example, if you voluntarily submit your wallet address for guarantee verification, you consent to our review of publicly available on-chain data associated with that wallet.

## 7. 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 subscription payments and refunds.
- **Community Platforms:** Discord, to deliver community services including voice channels and group sessions.
- **Analytics Providers:** to understand usage patterns and improve our services.
- **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 and is responsible for its own compliance with applicable law.

## 8. International Data Transfers

Because we operate globally and use third-party platforms based in the United States, Canada, and other countries, your personal information may be transferred to, stored in, and processed in jurisdictions outside your own.

For payment processing, your payment information is handled by our Merchant of Record, Whop, and its payment processors (including Stripe), which maintain their own safeguards for international transfers, including the European Commission's Standard Contractual Clauses for transfers of personal data out of the European Economic Area.

For other transfers, we take reasonable steps to ensure your personal information is protected in accordance with this Policy, including relying on the data protection terms and safeguards offered by our service providers. By using our services, you acknowledge that your information may be transferred as described, where legally permitted.

## 9. Data Retention

We retain personal information only as long as necessary to fulfill the purposes for which it was collected, or as required by law:

- **Account and subscription data:** the duration of your active subscription and 24 months after cancellation, for compliance and dispute resolution.
- **Payment and transaction records:** 7 years, to comply with tax and financial record-keeping obligations.
- **Wallet verification data:** the duration of the mentorship guarantee evaluation period and 12 months after the claim window closes, then deleted.
- **Communication records:** 24 months after the last communication, then deleted.
- **Session recordings:** up to 12 months for quality assurance, then deleted.
- **Breach records:** at least 24 months from the date of the breach, as required by PIPEDA.
- **Community and attendance data:** the duration of your active enrollment and 12 months thereafter.

When personal information is no longer needed, we securely destroy, erase, or anonymize it. Blockchain transaction data is publicly accessible on-chain and cannot be deleted by the Company or any party.

## 10. Data Security

We implement reasonable administrative, technical, and organizational safeguards to protect personal information against unauthorized access, use, disclosure, modification, or destruction. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security. Use of blockchain networks involves inherent risks beyond our control. You are responsible for maintaining the security of your own wallet private keys and account credentials.

## 11. Data Breach Notification

In the event of a breach of security safeguards involving personal information under our control that poses a real risk of significant harm, we will report the breach to the Office of the Privacy Commissioner of Canada as soon as feasible; notify affected individuals within 72 hours of becoming aware of the breach, describing the nature of the breach, the information involved, and the steps we are taking; notify any other organization or authority that may reduce the risk of harm; and maintain records of all breaches for at least 24 months. Where the GDPR applies, we will also notify the relevant supervisory authority and affected individuals in accordance with its requirements.

## 12. Your Privacy Rights

Regardless of where you live, you may request to access the personal information we hold about you; correct inaccurate or incomplete information; delete your personal information where legally permitted; and withdraw consent to our collection, use, or disclosure, subject to legal or contractual restrictions.

If you are in the European Economic Area, you also have the right to restrict or object to certain processing, the right to data portability, and the right to lodge a complaint with your local supervisory authority.

To exercise any of these rights, contact the Privacy Officer at [mattwayneconcepts@gmail.com](mailto:mattwayneconcepts@gmail.com). We respond to verified requests within 30 days. If more time is needed due to complexity, we will notify you within the initial 30-day period with a revised timeline. Certain information may need to be retained for legal, regulatory, or contractual obligations.

## 13. Privacy Complaints

If you believe your personal information has been handled in a manner that does not comply with this Policy or applicable law, you may file a complaint with the Privacy Officer at [mattwayneconcepts@gmail.com](mailto:mattwayneconcepts@gmail.com). We will acknowledge receipt within 7 business days, investigate, and provide a written response 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](http://oipc.bc.ca)).
- **Elsewhere in Canada:** Office of the Privacy Commissioner of Canada ([priv.gc.ca](http://priv.gc.ca)).
- **European Economic Area:** your local Data Protection Authority.
- **California:** California Privacy Protection Agency or Attorney General ([oag.ca.gov](http://oag.ca.gov)).

## 14. California Privacy Rights

California residents may request disclosure of the categories of personal information collected and request deletion, subject to legal exceptions. For the categories we collect, the purposes for which we use them, and the categories of third parties with whom we share them, see Sections 3, 4, and 7. We do not sell personal information and do not use or disclose sensitive personal information for purposes other than those permitted under the CCPA/CPRA. To exercise your California rights, contact [mattwayneconcepts@gmail.com](mailto:mattwayneconcepts@gmail.com).

## 15. 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 collected information from a minor, we will delete it promptly.

## 16. Third-Party Links

Our services may contain links to third-party websites and platforms. We are not responsible for the privacy practices or content of any third party. We encourage you to review the privacy policies of any third-party service you access.

## **17. Changes to This Policy**

We may update this Policy from time to time. Material changes will be communicated by posting the updated Policy on our platform at least 30 days before they take effect. Non-material changes may be made at any time without advance notice. Your continued use of the services after the notice period constitutes acceptance of the updated Policy.

## **18. Governing Law**

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

## **19. Contact**

### **Matt Wayne, Privacy Officer**

The Alpha Club Inc.

112 – 970 Burrard Street, Vancouver, BC, Canada, V6Z 2R4

Email: [mattwayneconcepts@gmail.com](mailto:mattwayneconcepts@gmail.com)