

Privacy Policy

APEX Editors · Effective date: July 2, 2026

1. Controller

This Privacy Policy explains how MnsillaSocial OÜ, a private limited company incorporated in the Republic of Estonia, VAT No. EE102636217 (the “Company”, “we”, “us”) processes personal data in connection with the APEX Editors program. The Company is the data controller. Contact: [SUPPORT EMAIL]. Registered address: [REGISTERED ADDRESS, Tallinn, Estonia].

2. Data We Collect

- **Account and purchase data:** name, email address, country, and billing information processed at checkout. Payment card details are handled by Whop and its payment processors; we never receive or store full card numbers.
- **Program participation data:** community posts and messages, call attendance, certification submissions, video review submissions, and progress records.
- **Communications:** emails, direct messages, and support requests you send us, including via Instagram.
- **Technical data:** device, browser, IP address, and usage analytics collected by the platforms hosting the Program and our website.

3. Purposes and Legal Bases (GDPR)

- **Delivering the Program** (curriculum access, community, calls, certification, placements) — performance of a contract (Art. 6(1)(b)).
- **Billing, tax, and accounting** — legal obligation (Art. 6(1)(c)) and performance of a contract.
- **Program communications and support** — performance of a contract and legitimate interests (Art. 6(1)(f)).
- **Marketing emails and announcements** — consent (Art. 6(1)(a)), which you may withdraw at any time via the unsubscribe link or by contacting us.
- **Enforcing our terms and protecting the community** (e.g. non-solicitation, content leaks) — legitimate interests.

4. Processors and Recipients

We use trusted third-party services to operate the Program, each acting under its own data processing terms: Whop (checkout, billing, membership management), Skool (community and course hosting), email and automation providers (e.g. Make.com, ManyChat) for messaging and workflows, Notion for internal documentation, and analytics tools on our website. We do not sell personal data.

5. International Transfers

Some providers are located outside the European Economic Area (notably in the United States). Where personal data is transferred outside the EEA, we rely on adequacy decisions (including the EU–US Data Privacy Framework where applicable) or Standard Contractual Clauses to ensure adequate protection.

6. Retention

We keep account and participation data for as long as your membership is active and for a reasonable period afterwards to handle guarantee claims, disputes, and re-enrollment restrictions. Invoicing and accounting records are retained for seven (7) years as required by Estonian accounting law. Marketing data is kept until you unsubscribe or withdraw consent.

7. Your Rights

Under the GDPR you have the right to access, rectify, and erase your personal data; to restrict or object to processing; to data portability; and to withdraw consent at any time without affecting prior processing. To exercise these rights, contact us at the email above. You also have the right to lodge a complaint with a supervisory authority — in Estonia, the Data Protection Inspectorate (Andmekaitse Inspektsioon, aki.ee) — or with the authority in your country of residence.

8. Cookies

Our website and the platforms hosting the Program use cookies and similar technologies for functionality and analytics. You can control cookies through your browser settings and, where presented, through the cookie consent banner.

9. Children

The Program is intended for adults aged 18 and over. We do not knowingly collect personal data from children.

10. Changes

We may update this Privacy Policy from time to time. The current version is always available where the Program is sold, and material changes will be communicated to active members.