

## **THE ALPHA CLUB INC. PRIVACY POLICY**

Effective Date: February 18, 2026

Last Updated: February 18, 2026

This Privacy Policy describes how The Alpha Club Inc., a corporation organized under the laws of British Columbia, Canada (“Company,” “we,” “us,” or “our”), collects, uses, discloses, and safeguards your information when you access our websites, purchase our services, or participate in our community platforms.

Corporate Address:

The Alpha Club Inc.

112 – 970 Burrard Street, Office #1614

Vancouver, British Columbia V6Z 2R4

Canada

By using our services, you consent to the practices described in this Policy.

### 1. Information We Collect

- Personal Information: name, email address, billing details, account identifiers.
- Transaction Information: subscription history and payment confirmations (processed by third-party providers).
- Usage Data: IP address, device type, browser type, pages visited, timestamps.
- Blockchain Data: publicly available wallet addresses and transaction history when voluntarily submitted.
- Communication Data: messages, emails, support requests.
- Community Activity Data: voice channel participation metrics and course completion logs.

We do NOT store full payment card numbers. Payment information is processed securely by third-party processors in accordance with their own compliance standards.

### 2. How We Use Information

We use collected information to:

- Provide and manage subscriptions and access.
- Process payments through third-party processors.
- Verify eligibility for performance guarantees.
- Improve services and platform functionality.
- Communicate updates, policies, or support responses.
- Detect fraud, abuse, or policy violations.
- Comply with legal obligations.

### 3. Legal Bases for Processing

If you are located in the European Economic Area, we process personal data based on:

- Contractual necessity.
- Legitimate business interests.
- Legal compliance obligations.
- Your consent where required.

If you are located in Canada, personal information is processed in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial legislation, including British Columbia's Personal Information Protection Act (PIPA).

### 4. Sharing of Information

We do not sell personal information.

We may share data with:

- Payment processors (e.g., Whop).
- Community platforms (e.g., Discord).
- Analytics providers.
- Legal authorities if required by law.
- Professional advisors (legal, accounting).

All third-party providers operate under their own privacy policies.

## 5. International Data Transfers

Because we operate globally, your information may be transferred outside your jurisdiction, including to Canada and the United States. By using our services, you consent to such transfers where legally permitted.

## 6. Data Retention

We retain personal information only as long as necessary for:

- Contract fulfillment.
- Legal compliance.
- Dispute resolution.
- Fraud prevention.

Blockchain data remains publicly accessible on-chain and cannot be deleted.

## 7. Data Security

We implement reasonable administrative, technical, and organizational safeguards. However, no system is completely secure. Use of blockchain networks involves inherent security risks.

## 8. Your Rights

Depending on your jurisdiction, you may have rights to:

- Access your personal data.
- Correct inaccurate information.
- Request deletion where legally permitted.
- Restrict or object to certain processing.
- Withdraw consent where applicable.

Verified privacy requests will be responded to within thirty (30) days unless extended as permitted by law.

Requests may be submitted to [mattwayneconcepts@gmail.com](mailto:mattwayneconcepts@gmail.com).

## 9. California Privacy Rights (CCPA/CPRA)

California residents may request disclosure of categories of data collected and request deletion, subject to legal exceptions. We do not sell personal information.

#### 10. Children's Privacy

Our services are not directed to individuals under 18. We do not knowingly collect personal information from minors.

#### 11. Cookies & Tracking Technologies

We may use cookies and similar technologies to improve functionality and analytics. You may disable cookies in your browser settings, though certain features may not function properly.

#### 12. Third-Party Links

Our services may contain links to third-party platforms. We are not responsible for their privacy practices.

#### 13. Changes to This Policy

We may update this Privacy Policy at any time. Updates are effective upon posting. Continued use constitutes acceptance of the revised Policy.