

THE ALPHA CLUB INC.

PRIVACY POLICY

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

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”). This Policy operates alongside our Terms of Service, End User License Agreement, and Refund and Return Policy. 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 is responsible for receiving and responding to privacy complaints, access requests, correction requests, and any questions about our privacy practices.

3. Information We Collect

We collect the following categories of personal information in the course of providing our services:

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 and their third-party payment processors in accordance with their own security standards.
- **Communication Data:** Messages, emails, and support requests you send to us.
- **Wallet Data:** Publicly available blockchain wallet addresses voluntarily submitted for the purpose of verifying eligibility under the Conditional 10X Performance Guarantee. Wallet ownership verification may involve a micro-transaction (0.001 SOL) which is returned. We access only publicly available on-chain transaction data and do not access, control, or transfer any funds. When linked to your identity through the verification 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 Activity Data:** Voice channel participation metrics (including time logged in the Live Trading Voice Channel as tracked by our community stat bot), course completion logs, and attendance records for group sessions.
- **Recording Data:** Audio recordings of group trading sessions, voice chat sessions, and community events recorded for quality assurance and educational purposes. By participating in these sessions, you consent to such recording as stated in our Terms of Service.
- **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. Your participation in the Alpha Club Discord community involves Discord's own data collection practices, which are governed by Discord's Privacy Policy (discord.com/privacy).

4. How We Use Your Information

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

- To provide and manage your subscription, course access, and community membership.
- To process payments through third-party processors.
- To verify eligibility for the Conditional 10X Performance Guarantee, including reviewing on-chain wallet data.
- To track course completion, call attendance, voice channel participation, and journal submissions for program 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, regulatory requirements, and lawful requests from authorities.
- To improve our services, platform functionality, and educational content.

We do not use your personal information for purposes unrelated to those listed above without obtaining your consent.

5. Consent

We collect, use, and disclose your personal information with your knowledge and consent, except where permitted or required by law. By subscribing to our services and providing your personal information, you consent to the collection, use, and disclosure of that information as described in this Policy.

You may withdraw your consent at any time by contacting the Privacy Officer at mattwayneconcepts@gmail.com. Withdrawal of consent may affect our ability to provide certain services. We will inform you of the consequences of withdrawing consent when you make your request.

In some cases, your consent may be implied. For example, if you voluntarily submit your wallet address for guarantee verification, you are consenting to the review of publicly available on-chain transaction data associated with that wallet.

6. 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, and your consent where required.

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

7. Sharing of Information

We do not sell personal information.

We may share personal information with the following categories of third parties, only to the extent necessary for the purposes described in this Policy:

- **Payment Processors:** Whop and their payment processing partners, for the purpose of processing subscription payments and refunds.
- **Community Platforms:** Discord, for the purpose of delivering community services, including voice channels and group sessions.
- **Analytics Providers:** For the purpose of understanding usage patterns and improving our services.
- **Legal Authorities:** When required by law, regulation, court order, or lawful request from a government or regulatory authority.
- **Professional Advisors:** Legal, accounting, and other professional 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, personal information may be transferred to the successor entity. We will notify affected individuals of any such transfer.

All third-party service providers operate under their own privacy policies and are responsible for their own compliance with applicable privacy laws.

8. International Data Transfers

Because we operate globally 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, including Canada and the United States. These jurisdictions may have different privacy laws than your jurisdiction of residence.

By using our services, you acknowledge and consent to such transfers where legally permitted. We take reasonable steps to ensure that your personal information is protected in accordance with this Policy regardless of where it is stored or processed.

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. Our general retention practices are:

- **Account and subscription data:** Retained for the duration of your active subscription and for 24 months after cancellation or account closure, for compliance and dispute resolution purposes.
- **Payment and transaction records:** Retained for 7 years to comply with tax and financial record-keeping obligations.
- **Wallet verification data:** Retained for the duration of the guarantee evaluation period and for 12 months after the claim window closes, then deleted.
- **Communication records (emails, support requests):** Retained for 24 months after the last communication, then deleted.
- **Session recordings:** Retained for up to 12 months for quality assurance purposes, then deleted.
- **Breach records:** Retained for at least 24 months from the date of the breach, as required by PIPEDA.
- **Community activity data (voice channel logs, course completion):** Retained for the duration of your active subscription and for 12 months after cancellation.

When personal information is no longer needed for the purpose for which it was collected, we will 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 over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

Use of blockchain networks involves inherent security risks beyond the Company's 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 to any individual, we will:

- Report the breach to the Office of the Privacy Commissioner of Canada (OPC) as soon as feasible.

- Notify affected individuals within 72 hours of becoming aware of the breach, describing the nature of the breach, the personal information involved, and the steps we are taking to address it.
- Notify any other organization or government institution that may be able to reduce the risk of harm.
- Maintain a record of all breaches of security safeguards, whether reported or not, for at least 24 months from the date of the breach.

This notification commitment is consistent with PIPEDA's Breach of Security Safeguards Regulations and applies to all categories of personal information we collect, including wallet data, account information, and communication records.

12. Your Rights

Depending on your jurisdiction, you have the following rights regarding your personal information:

- **Access:** You may request access to the personal information we hold about you.
- **Correction:** You may request correction of any inaccurate or incomplete personal information.
- **Deletion:** You may request deletion of your personal information where legally permitted. Certain information may need to be retained for legal, regulatory, or contractual obligations.
- **Withdrawal of Consent:** You may withdraw your consent to the collection, use, or disclosure of your personal information at any time, subject to legal or contractual restrictions. We will inform you of the consequences of withdrawal.
- **Restriction or Objection:** Where applicable under your local law, you may restrict or object to certain processing of your personal information.

To exercise any of these rights, contact the Privacy Officer at mattwayneconcepts@gmail.com. We will respond to verified requests within 30 days. If additional time is needed due to the complexity of the request, we will notify you within the initial 30-day period and provide a revised timeline.

13. Privacy Complaints

If you believe your personal information has been handled in a manner that does not comply with this Policy or applicable privacy legislation, you may file a complaint with the Privacy Officer at mattwayneconcepts@gmail.com.

Upon receiving a complaint, the Privacy Officer will:

- Acknowledge receipt within 7 business days.
- Investigate the complaint and take appropriate corrective action if warranted.
- Provide a written response within 30 days of receiving the complaint.

If you are not satisfied with the resolution, you have the right to file a complaint with the applicable regulatory authority:

- For British Columbia residents: Office of the Information and Privacy Commissioner for British Columbia (OIPC) — oipc.bc.ca
- For other Canadian residents: Office of the Privacy Commissioner of Canada (OPC) — priv.gc.ca
- For California residents: California Attorney General — oag.ca.gov

Nothing in this Policy restricts your ability to post honest reviews of our services, file a complaint with or provide information to any government agency, regulatory body, or law enforcement agency.

Nothing in this Policy is intended to limit, exclude, or waive any rights, benefits, or protections you may have under applicable consumer protection legislation. Where any term of this Policy conflicts with a mandatory consumer protection right, the consumer protection right shall prevail.

14. California Privacy Rights

California residents may request disclosure of the categories of personal information collected and request deletion of their personal information, subject to legal exceptions. For details on the categories of personal information we collect, the purposes for which we use it, and the categories of third parties with whom we share it, see Sections 3, 4, and 7 of this Policy. We do not sell personal information. We do not use or disclose sensitive personal information for purposes other than those permitted under the CCPA/CPRA.

To exercise your California privacy rights, contact 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 personal information from a minor, we will take steps to delete that information promptly.

16. Third-Party Links

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

17. Changes to This Policy

We may update this Privacy 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. Your continued use of the services after the notice period constitutes acceptance of the updated Policy.

Non-material changes (such as formatting, clarifications, or corrections that do not alter your rights) may be made at any time without advance notice.

18. Contact

For any questions, concerns, or requests regarding this Privacy Policy or your personal information, contact:

Matt Wayne, Privacy Officer

The Alpha Club Inc.

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

Email: mattwayneconcepts@gmail.com
