

# WEBSITE PRIVACY POLICY

AkriTrade Inc., a Wyoming corporation, dba POW

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This Website Privacy Policy ("Privacy Policy") explains how AkriTrade Inc., a Wyoming corporation, dba POW ("POW," "we," "us," or "our") collects, uses, discloses, and otherwise processes personal information when you visit or use our website located at [www.team-pow.com](http://www.team-pow.com) (the "Site"), our web application, and related online services that link to or reference this Privacy Policy (collectively, the "Services"). This Privacy Policy is intended primarily for users located in the United States.

Our Services also include educational content, proprietary algorithmic trading signals, and facilitating access to third-party trading platforms, funded account providers, and copy-trading technology, as described further below.

Your use of the Services is also subject to our Terms of Service / Master Services Agreement ("Terms of Service"). Capitalized terms used but not defined in this Privacy Policy have the meanings given to them in the Terms of Service.

## **NOTICE AT COLLECTION (CALIFORNIA)**

We collect the categories of personal information listed below for the business and commercial purposes described in "How We Use Personal Information," and we may disclose them to the categories of third parties described in "How We Disclose Personal Information."

Some of this information may be "sensitive personal information" as defined under California law. We do not use or disclose sensitive personal information for purposes other than those permitted by California law (such as providing the Services and maintaining security), and we do not use sensitive personal information for purposes of inferring characteristics about you.

The categories of personal information we may collect include:

- Identifiers (such as name, email address, billing address, IP address, account username, and similar identifiers).
- Trading and platform identifiers (such as third-party trading account numbers, platform IDs, portfolio or strategy selections, and copier configuration settings).

- Customer records information (such as payment method details processed by our payment providers, order history, subscription details, and related transaction information), including information processed through third-party payment and commerce platforms such as Whop and Stripe.
- Commercial information (such as products or services purchased, obtained, or considered, and other purchasing or consumption histories or tendencies).
- Internet or other electronic network activity information (such as browsing history, search history, and information about your interactions with our Site, app, or emails, including log and analytics data).
- Approximate geolocation (such as country, state/region, or time zone inferred from your IP address).
- Professional or educational information that you choose to provide (such as trading experience, occupation, or related background information).
- Inferences drawn from the above (such as preferences or interests related to educational content or platform usage, but not individualized trading recommendations).

We retain personal information for as long as needed to achieve the purposes described in this Privacy Policy, including to provide the Services, comply with our legal obligations, resolve disputes, and enforce our agreements; see "Data Retention" below for more detail. We may sell or share (for cross-context behavioral advertising) certain identifiers, internet or other electronic network activity information, and inferences. You can opt out of these activities as described in "Your Privacy Choices and Rights" below.

By using the Services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the Services.

## **1. PERSONAL INFORMATION WE COLLECT**

We may collect the following types and categories of information about you, either directly from you, automatically through your use of the Services, or from third parties.

### **1.1 Information You Provide to Us**

We collect personal information that you provide directly to us through the Services, such as when you:

- Create an account, subscribe to our memberships (e.g., POW Trader Collective), or register for an online program.
- Purchase products or services from us.
- Contact us by email, web form, or through the Services.
- Sign up for newsletters, marketing communications, or waitlists.
- Participate in surveys, promotions, or other events.
- Post content, comments, or feedback through the Services or our social media channels.

The information you provide may include:

- **Contact and account information:** name, email address, phone number, billing address, username, password, and similar identifiers.
- **Trading-related setup information:** third-party platform usernames or account identifiers, selected strategies or portfolios, copier configuration settings, and other information you provide to connect your account to third-party trading tools.
- **Subscription and transaction information:** products or services purchased, subscription plan and term, payment status, limited payment method details (such as the last four digits of a card number when returned by a payment processor), tax information as required by law, and associated records. (Your full payment card details are processed by our third-party payment processors, such as Whop and Stripe, and are not stored by us in full.)
- **Profile information:** demographic information (such as approximate age range), trading experience, goals, interests, time zone, and other information you choose to share in connection with your account or participation in our community.
- **Communications and support information:** content of messages and other communications you send to us (such as support inquiries, feedback, and other correspondence), as well as any information you submit through forms, surveys, or questionnaires.
- **User content:** comments, posts, or other materials you upload or submit through the Services or our community features (where applicable).

## 1.2 Information Collected Automatically

When you access or use the Services, we and our service providers may automatically collect certain information about your device and usage, including through cookies, pixels, local storage, and similar tracking technologies. This information may include:

- **Device and usage information:** IP address, device identifiers, browser type and version, operating system, language settings, referring URLs, pages viewed, links clicked, and the dates and times of your visits.
- **Log data:** information about your use of the Services, including access times, pages viewed, and your interactions with our features and content.
- **Analytics information:** data collected via analytics tools (such as Google Analytics or similar services), which may include information about how often you use the Services, the events that occur within the Services, aggregated usage, performance metrics, and where the application was downloaded from.

We may associate this automatically collected information with other personal information we collect about you.

### **1.3 Information from Third Parties**

We may receive personal information about you from third parties, such as:

Lead-Fi and third-party verification services: Where permitted by applicable law and consistent with our agreements with you, we may use third-party verification services such as Lead-Fi to help verify certain information you provide (for example, aspects of your income or credit profile) in connection with eligibility assessments or compliance checks. By agreeing to this Privacy Policy and the Terms of Service, you acknowledge and consent to our use of such third-party verification services as part of providing and administering the Services. Lead-Fi is an independent third party, and its collection and use of your information is governed by its own privacy policy and terms, not this Privacy Policy. For more information about Lead-Fi and its data practices, please visit .

- Payment processors and e-commerce/service platforms that process transactions and send us limited billing and subscription details, including platforms such as Whop and Stripe.
- Email and communications providers that help us manage and deliver emails and other messages.

- Analytics and advertising partners, who may provide us with information about your engagement with our Site, ads, or emails, and may help us infer interests or preferences.
- Third-party platforms or tools that we integrate with or that you choose to connect to our Services (for example, trading-related platforms or community platforms, if applicable), which may include funded account providers, brokers, copy-trading and middleware platforms, payout processors, verification services, and related value-added resellers or facilitators such as PrimeBridge, TCBridge, Social Trader Tools, Rise, Whop, and Lead-Fi (or similar third-party providers that may be used from time to time).
- Social media platforms, if you engage with our pages, content, or ads, or if you choose to log in or sign up using social media credentials (where offered).

The information we receive from third parties is governed by the privacy policies and settings of those third parties. We encourage you to review their policies and adjust your settings directly with them as appropriate.

We may receive limited account status, trading performance attribution, payout status, or verification confirmations from these third parties (such as funded account providers, brokers, payout processors, and verification services), but we do not receive or store full brokerage credentials or identity documents.

## **2. HOW WE USE PERSONAL INFORMATION**

We use the personal information we collect for the following business and commercial purposes:

- **Providing and operating the Services:** to create and manage your account; provide our courses, subscriptions (including POW Trader Collective), and other products and services; process and fulfill orders; and provide customer support; and to facilitate onboarding to third-party funded trading accounts, copy-trading platforms, and related technical infrastructure.
- **Communications:** to respond to your inquiries; send administrative information such as confirmations, invoices, technical notices, and updates about your account, subscription, or the Services; and communicate with you about your use of the Services.

- **Marketing and promotional purposes:** to send you newsletters, promotional emails, and other marketing communications about products, services, and features we believe may interest you, in accordance with applicable law and your communication preferences. You may opt out of marketing emails at any time as described in "Your Privacy Choices and Rights" below.
- **Personalization:** to tailor content and experiences on the Services, such as by remembering your preferences, customizing content we show you, and generating inferences about your likely interests.
- **Analytics and improvement:** to monitor and analyze usage and trends, measure the effectiveness of our marketing, understand how users interact with the Services, and develop, optimize, and improve our products, Services, and user experience.
- **Security and fraud prevention:** to help maintain the safety, security, and integrity of the Services, our systems, and your account; to detect, prevent, and respond to potential or actual fraud, unauthorized activities, and other harmful or unlawful conduct.
- **Legal and compliance:** to comply with applicable laws, regulations, legal processes, or governmental requests; to enforce our Terms of Service and other agreements; and to protect our rights, property, users, and the public. Coordinating with third-party providers for fraud prevention, compliance checks, verification services, and payout administration (in a pass-through capacity), where applicable.
- **Business transactions:** in connection with or during negotiations of any merger, acquisition, asset sale, financing, reorganization, bankruptcy, or other corporate transaction involving all or part of our business.
- **Other purposes:** for any other purpose for which we provide notice at the time your personal information is collected, or with your consent.

POW does not use personal information to provide individualized trading advice, discretionary account management, or investment recommendations, and our Services are provided for educational and informational purposes only.

### 3. HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose personal information to the following categories of recipients:

- **Service providers and vendors:** we may share personal information with third-party service providers that perform services on our behalf, such as website hosting, maintenance, data storage, customer support, payment processing, analytics, email delivery, marketing services, security, and other operational support. These service providers are authorized to use your personal information only as necessary to provide services to us and are subject to appropriate contractual safeguards.
- **Business partners and integrations:** where you choose to use tools or platforms that integrate with our Services (for example, certain trading-related platforms, community platforms, or communications tools), we may share personal information with those partners to facilitate your use of those integrations, pursuant to your instructions or consent. This may include funded account providers, brokers, copy-trading and middleware platforms, payout processors, verification services, and related value-add resellers or facilitators, such as Whop, Lead-Fi, PrimeBridge, TCBridge, Rise, and Social Trader Tools (or similar third-party providers that may be used from time to time). Where POW facilitates or administers payouts in connection with these relationships, it does so solely in a pass-through capacity based on information received from the relevant third-party providers.
- **Analytics and advertising partners:** we may allow third-party analytics and advertising partners to collect information about your use of the Services over time and across different services. These partners may use cookies and similar technologies to collect or receive information from our Site and other sites, and use that information to provide measurement services and to help us (and, in some cases, others) deliver ads that may be of interest to you.
- **Legal and compliance recipients:** we may disclose personal information if we believe doing so is reasonably necessary to comply with applicable laws, regulations, legal processes, or governmental requests; to enforce our Terms of Service or other agreements; or to protect the rights, property, or safety of AkriTrade Inc., dba POW, our users, or others.
- **Business transfers:** we may disclose or transfer personal information in connection with, or during negotiations of, any merger, sale of assets, financing, acquisition, reorganization, or similar transaction, including in the event of insolvency, bankruptcy, or receivership.

- **With your direction or consent:** we may disclose personal information to any other third party with your authorization, at your direction, or as otherwise described to you at the time of collection.

These third parties operate independently from POW, and their collection and use of personal information is governed by their own privacy policies. Where POW, in its capacity as AkriTrade Inc., dba POW, facilitates payouts or allocations, it does so solely as an administrative pass-through allocation agent based on information received from third-party providers and does not take ownership of or exercise investment discretion over such funds. We may aggregate, de-identify, or anonymize personal information so that it can no longer reasonably be linked to an identifiable individual. We may use and disclose such information for any lawful purpose.

## **4. COOKIES, ANALYTICS, ADVERTISING, AND TRACKING TECHNOLOGIES**

### **4.1 Cookies and Similar Technologies**

We and our service providers may use cookies, web beacons (pixel tags), local storage, and similar tracking technologies (collectively, "cookies") to collect information about your interactions with the Services. Cookies are small data files stored on your device that help us remember and process information about your visit. Where required by applicable law, we provide mechanisms to opt out of the sale or sharing of personal information, including honoring Global Privacy Control signals.

We may use cookies:

- To enable core functionality of the Site and Services, such as authentication, security, and account management.
- To remember your preferences and settings.
- To help us understand how users access and use the Services in order to improve performance, content, and user experience.
- To personalize content and tailor our marketing and advertising to your interests.

You may be able to set your browser to refuse cookies or to alert you when cookies are being sent. However, some features of the Services may not function properly if you disable cookies.

## **4.2 Analytics**

We may use third-party analytics tools, such as Google Analytics, to help us understand how users engage with the Services, including which pages are visited, how long users stay, what links they click, and similar information. These tools may use cookies and other tracking technologies to collect information, including your IP address, device identifiers, and information about your interactions with the Services.

## **4.3 Online Advertising and Cross-Context Behavioral Advertising**

We may work with third-party advertising partners to show you ads that we believe may be of interest to you. These partners may use cookies and similar technologies to collect information about your use of the Services and other websites and apps over time, and they may use this information to serve ads that are tailored to your interests (this practice may be considered a "sale" or "sharing" of personal information for cross-context behavioral advertising under California law).

You can learn more about interest-based advertising and how to opt out of certain types of interest-based advertising from participating companies by visiting:

- Network Advertising Initiative: <http://www.networkadvertising.org/choices/>
- Digital Advertising Alliance: <http://www.aboutads.info/choices/>

If you are in California, you may also use the "Do Not Sell or Share My Personal Information" mechanisms described in "Your Privacy Choices and Rights" below. Please note that even if you opt out of interest-based advertising, you may still see ads online, but they may be less tailored to your interests.

## **4.4 "Do Not Track" Signals**

Your browser may offer a "Do Not Track" or similar setting to indicate your preferences regarding tracking by online services. Our Services currently do not respond to "Do Not Track" signals. However, we may treat certain browser or device-level privacy settings, or Global Privacy Control signals, as opt-out requests where required by applicable law.

## 5. EMAIL COMMUNICATIONS AND CAN-SPAM COMPLIANCE

If you provide us with your email address, we may send you:

- Transactional or relationship emails, such as confirmations, receipts, billing-related communications, service announcements, and important notices about your account or the Services.
- Marketing and promotional emails, such as newsletters, offers, and information about products or services that we think may interest you.

In compliance with the U.S. CAN-SPAM Act, we:

- Will not use false or misleading header information or subject lines.
- Will identify marketing messages as advertisements where required.
- Will include our valid physical or mailing address in commercial emails.
- Will provide a clear and conspicuous way to opt out of receiving marketing emails.
- Will honor your opt-out request within the time period required by applicable law.

You may opt out of marketing emails at any time by clicking the "unsubscribe" link in any marketing email or by contacting us as described in "Your Privacy Choices and Rights" below. Please note that even if you opt out of marketing emails, we may still send you transactional or service-related communications, such as emails about your account, transactions, or legal notices.

## 6. YOUR PRIVACY CHOICES AND RIGHTS

### 6.1 General Choices

You have certain choices about how we use and disclose your personal information:

- **Account information:** you may review, update, or correct certain account information at any time by logging into your account (if available) or contacting us.
- **Marketing communications:** you may opt out of marketing emails as described above.
- **Cookies and online tracking:** you may be able to manage cookies and similar technologies through your browser settings or through available opt-out tools provided by third-party analytics and advertising partners, as described above.

## 6.2 Rights for California and Other U.S. Residents

Depending on where you reside (for example, if you are a resident of California or another state with similar privacy laws), you may have certain rights with respect to your personal information, subject to applicable law. These rights may include:

- **Right to know/access:** the right to request that we disclose the categories and specific pieces of personal information we have collected about you, the categories of sources from which the information was collected, the business or commercial purpose for collecting, selling, or sharing the information, and the categories of third parties to whom we disclosed the information.
- **Right to deletion:** the right to request that we delete personal information we have collected from you, subject to certain exceptions (for example, where we need the information to provide the Services, comply with legal obligations, or protect our rights or those of others).
- **Right to correction:** the right to request that we correct inaccurate personal information that we maintain about you.
- **Right to opt out of sale or sharing:** the right to direct us not to sell or share your personal information for cross-context behavioral advertising. As described above, our use of certain analytics and advertising cookies or similar technologies may be considered a "sale" or "sharing" of personal information under California law. You may opt out of these activities as described below.
- **Right to limit use and disclosure of sensitive personal information:** if we collect sensitive personal information (as defined under California law) and use or disclose it for purposes beyond those permitted by law, you may have the right to direct us to limit such use and disclosure. At this time, we do not use or disclose sensitive personal information in a manner that triggers this right.
- **Right to non-discrimination:** we will not discriminate against you for exercising your privacy rights. This means, for example, that we will not deny you goods or services, charge you different prices, or provide you with a different level or quality of services solely because you chose to exercise your privacy rights. However, we may offer different prices or levels of services that are reasonably related to the value of

your personal information where permitted by law (such as certain loyalty or rewards programs, if any).

### **6.3 How to Exercise Your Rights**

To exercise any of the rights described above (where available), you may contact us using the methods below:

- Email: [info@team-pow.com](mailto:info@team-pow.com)
- Web form: by submitting a privacy or data subject request through any dedicated form or portal we make available on the Site from time to time (if available).
- Mail: by writing to our registered office address or principal place of business as listed on our website from time to time, addressed to "AkriTrade Inc., dba POW – Privacy / Data Protection".

When you submit a request, we may need to verify your identity to protect against fraudulent or unauthorized requests. The verification steps may vary depending on the sensitivity of the information involved and the nature of your request (for example, we may ask you to verify your email address and/or provide certain account or transaction details).

Verification may include confirming information associated with your account or third-party platform identifiers, where appropriate.

If you are a California resident, you may also designate an authorized agent to make certain requests on your behalf (such as requests to know, delete, or correct your personal information, or to opt out of sale/sharing). If you submit a request through an authorized agent, we may require additional documentation or verification to confirm the agent's authorization, consistent with applicable law.

### **6.4 Opting Out of Sale or Sharing of Personal Information**

To the extent our use of cookies and similar technologies for advertising and analytics purposes constitutes a "sale" or "sharing" of personal information under California law, you may opt out by:

- Adjusting your cookie or privacy preferences using any cookie management tool we provide on the Site (e.g., a "Cookie Settings" link or banner, if available).
- Contacting us using the information above and specifying that you wish to opt out of the "sale" or "sharing" of your personal information.

- Setting a browser-based opt-out preference signal (such as Global Privacy Control) where required by applicable law; we will treat such signals as opt-out requests to the extent required.

## **7. CHILDREN'S PRIVACY AND MINORS**

Our Services are intended for individuals who are at least 18 years old. As stated in our Terms of Service, if you are under 18, you may not use the Services. We do not knowingly collect personal information from children under 13 years of age, and we do not knowingly sell or share personal information of individuals under 16 years of age. Our Services are intended solely for adults and are not directed to minors.

If we become aware that we have inadvertently collected personal information from a child under 13 (or from a minor where parental consent is required), we will take reasonable steps to delete such information as required by applicable law. If you believe that we may have collected personal information from a child in violation of this Policy, please contact us using the information in "Contact Us" below.

## **8. DATA RETENTION**

We retain personal information for as long as reasonably necessary to fulfill the purposes described in this Privacy Policy, including:

- Providing and supporting the Services you request.
- Maintaining business and financial records (including for accounting, audit, and tax purposes).
- Complying with legal and regulatory obligations.
- Resolving disputes and enforcing our agreements.
- Maintaining appropriate business and operational records and improving the Services.

The specific retention period for different categories of personal information may vary depending on the nature of the information and the purposes for which it is processed. We may retain de-identified, aggregated, or anonymized information for longer periods, as permitted by law. Trading-related identifiers and payout records may be retained for longer periods where required for financial, accounting, or regulatory purposes.

## **9. DATA SECURITY**

We use reasonable technical, organizational, and administrative safeguards designed to protect personal information from unauthorized access, disclosure, alteration, or destruction.

These measures may include encryption in transit for certain data (for example, payment card information transmitted to our payment processors), access controls, and other security measures.

However, no method of transmission over the Internet or method of electronic storage is completely secure. We cannot guarantee the absolute security of your information. You are responsible for maintaining the confidentiality of your account credentials and for restricting access to your devices. If you believe your account or interaction with us is no longer secure, please notify us immediately.

## **10. INTERNATIONAL TRANSFERS**

The Services are operated by AkriTrade Inc., a Wyoming corporation, dba POW, which is based in the United States and may also process data in other countries. If you access the Services from the United States or elsewhere, your information may be transferred to, stored, and processed in the United States and other countries that may have different data protection laws than those in your jurisdiction.

Where required by applicable law, we will take appropriate measures to ensure that any cross-border transfers of personal information provide adequate protection for your rights and interests, such as by implementing contractual protections or other safeguards.

By using the Services or providing us with your information, you acknowledge that your personal information may be transferred to and processed in jurisdictions outside of your country of residence. This may include transfers between the United States and jurisdictions where our third-party trading, brokerage, verification, and payout partners operate.

## **11. THIRD-PARTY WEBSITES, TOOLS, AND INTEGRATIONS**

The Services may contain links to or integrate with third-party websites, tools, platforms, or services that are not operated or controlled by us, including third-party trading platforms, payment providers, analytics tools, advertising partners, and social media platforms. If you

choose to use these third-party services, any information you provide to them will be subject to their own terms and privacy policies, not this Privacy Policy.

We are not responsible for the privacy, security, or practices of any third-party websites or services. We encourage you to review the privacy policies of any third party you interact with.

POW does not control and is not responsible for the data practices, security, availability, or decisions of third-party trading platforms, brokers, funded account providers, verification services, or payout services (including, without limitation, PrimeBridge, TCBridge, Social Trader Tools, Lead-Fi, Rise, Whop, or similar providers).

## **12. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. When we do, we will update the "Last updated" date at the top of this page. We may also provide additional notice of material changes (such as by posting a notice on our Site or sending you a notification).

Your continued use of the Services after any update to this Privacy Policy becomes effective constitutes your acceptance of the updated Policy. If you do not agree to the updated Policy, you should discontinue use of the Services.

## **13. CONTACT US**

If you have any questions about this Privacy Policy or our privacy practices, or if you wish to exercise your privacy rights, you may contact us at:

AkriTrade Inc., a Wyoming corporation, dba POW

Attn: Privacy / Data Protection

Email: [info@team-pow.com](mailto:info@team-pow.com)

Mailing Address: Our registered office address or principal place of business as listed on our website from time to time

You may also contact us through any additional methods listed on the "Contact" or "Contact Us" page of our Site.