

**ALL STATEMENTS BELOW APPLY TO THE “ALPHA TRADING” STORE PRODUCTS BEING SOLD ON WHOP.IO, WHOP.COM, OR ANY OTHER DERIVATIVE URL LINKS OF WHOP, INC. ALL SALES ARE FINAL.**

Alpha Trading and Real Estate Group LLC (“Alpha Trading”) respects your privacy and is committed to ensuring that consumers who access our website and/or use or access products or services offered by us (“you” or “your”) are informed regarding the way their personal data is used. This Privacy Statement applies to Alphatradingmentorship.com (“Site”) and Alpha Trading Group, and all products and services offered by Alpha Trading Group and governs personal data collection and usage by us. For the purposes of this Privacy Policy Statement (“Statement”), unless otherwise noted, all references to Alpha Trading Group include the Site and Alpha Trading. By using the Site, you consent to the data practices described in this Statement and all revisions or amendments made to this Statement from time to time. Alpha Trading provides assistance to individuals with disabilities to communicate effectively with them. Please contact Alpha Trading at "alphatradingandrealestategroup.com"

**Collection of your Personal Information**

We collect information about you in a variety of ways depending on how you interact with us, the Site and our services, including:

1. Directly from you when you provide it to us, such as when you register for an account, sign up to receive communications from us, start a challenge or contact us by phone, email, or otherwise;
2. Automatically through the use of cookies, server logs, and other similar technologies when you interact with the Site, promotional material, advertisements and emails; and
3. From other sources, including, for example, our affiliates, business partners, service providers, online social media networks, and other third parties, or from publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

In order to better provide you with products and services offered, we may collect personally identifiable information, such as the following, which sets forth the types of personal information we collect and how we use the information:

<b>Context</b>	<b>Types of Data</b>	<b>Primary Purpose for Collection/Use of Data</b>
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**Account  
Registration**

We may collect your name, financial information, and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.

We have a legitimate interest in providing account related functionalities to our users and preventing illegal conduct.

**Biometric  
Identifiers**

We may collect certain biometric information about you, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns, or rhythms, and sleep, health, or exercise data that contain identifying information.

We are required to collect this information to meet our legal obligations and have a legitimate interest in doing so and preventing fraud.

**Client Information**

We collect the names and contact information of our clients and their employees with whom we may interact.

We have a legitimate interest in contacting our clients and communicating with them concerning normal business administration such as projects, services, and billing.

**Cookies and  
First-Party  
Tracking**

We use cookies and clear GIFs. "Cookies" are small pieces of information that a website sends to a computer's hard drive while a website is viewed.

We have a legitimate interest in making our website operate efficiently.

**Cookies and Third-Party Tracking**

We may place tracking technology on our website that collects analytics, records how you interact with our website, or allows us to participate in behavior-based advertising. This means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can report analytics to us or provide advertising about products and services tailored to your interests. That third party might also collect information over time and across different websites in order to serve advertisements on our website or other websites.

Where required by law, we base the use of third-party cookies upon consent.

**Demographic Information**

We collect personal information, such as your date of birth, race or location.

We have a legitimate interest in ensuring our users are legitimate and to prevent fraudulent and illegal activity.

**Email Interconnectivity**

If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.

We have a legitimate interest in understanding how you interact with our communications to you.

**Employment**

If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.

We use information about current employees to fulfil our obligations to employees. In some contexts, we are also required by law to collect information about employees or applicants. We also have a legitimate interest in using your information to have efficient staffing and work force operations.

**Feedback/Support**

If you provide us feedback or contact us for support, we will collect your name and email address, as well as any other

We have a legitimate interest in receiving, and acting upon, your feedback or issues.

content that you send to us, in order to reply.

**Mobile Devices**

We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our website or when visiting one of our stores.

We have a legitimate interest in identifying unique visitors, and in understanding how users interact with us on their mobile devices.

**Order Placement**

We collect your name, billing address, email address, phone number, and credit card number when you place an order.

We use your information to perform our contract to provide you with products or services.

**Partner Promotion**

We collect information that you provide as part of a co-branded promotion with another company.

We have a legitimate interest in fulfilling our promotions.

**Surveys**

When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third-party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.

We have a legitimate interest in understanding your opinions and collecting information relevant to our organization.

**Sweepstakes or contests**

When you participate in a sweepstakes or contest, we collect information about you which includes contact information to notify you if you are selected.

We have a legitimate interest in operating the sweepstakes and contests. In some contexts, we are also required by law to collect information about those that enter into our sweepstakes and contests, and we have a legitimate interest in complying with those laws.

**Website interactions**

We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.

We have a legitimate interest in understanding how you interact with our website to better improve it, and in understanding your preferences and interests to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.

**Web logs**

We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.

We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.

We collect this data and provide it to third parties, as discussed below, if it is a necessary step in the user's account creation process, contributes to the ease of use, reliability, security, or functionality of our products. If you purchase Alpha Trading's products or services, we collect billing and credit card information. This information is used to complete the purchase transaction or issue payments to you.

You may be required to provide certain personal information to us when you elect to use certain products or services. We also may gather additional personal or non-personal information in the future for the same purpose.

**Use of your Personal Information**

We collect and use your personal information to:

1. Operate and deliver the products or services you have requested.
2. We may also use your personally identifiable information to inform you of other products or services available from Alpha Trading and its affiliates.
3. To identify you when you visit our Sites or use our products or services.
4. To improve our services and product offerings.
5. To conduct analytics.
6. To communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback.

7. To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violations of our Terms of Use, other policies, security incidents, and harm to the rights, property, or safety of our company and our users, employees, or others.
8. To debug, identify and repair errors that impair existing intended functionality of our website and services.
9. To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.
10. For internal administrative purposes, as well as to manage our relationships.
11. For such other purposes as you may consent (from time to time).

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. As a result, our collection and processing of your information may be based in different contexts depending on your consent, our need to fulfill a contract, our obligations under law, and/or our legitimate interest in conducting our business. You explicitly consent to sharing your data with Alpha Trading and/or our affiliates with other proprietary simulated trading firms or third parties for the purposes of detecting fraudulent, deceptive, malicious, or criminal behavior or any violations of our Terms or this Agreement

### **Sharing Information with Third Parties**

In addition to the specific situations discussed elsewhere in this Statement, we may disclose personal information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with our corporate affiliates (*g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
2. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third-party intermediary.
3. **Public.** Our website may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
4. **Service Providers.** We may share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.
5. **Other simulated trading platforms.** We may share information with other simulated trading platforms and/or related affiliates in order to detect and protect against malicious, deceptive, fraudulent, or illegal activity or violations of our Terms of Use, and other policies.

6. **Other Disclosures with Your Consent.** We may disclose your information to other third parties when we have your consent or direction to do so.

### **Tracking User Behavior**

Alpha Trading may track and record the websites and pages our users visit within Alpha Trading, in order to determine what Alpha Trading services are the most popular. This data is used to deliver customized content and advertising within Alpha Trading to customers whose behavior indicates that they are interested in a particular subject area.

### **Automatically Collected Information**

Information about your computer hardware and software may be automatically collected by Alpha Trading. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain the quality of the service, and to provide general statistics regarding use of the Site.

### **Use of Cookies**

The Site may use “cookies” to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Alpha Trading pages, or register with the Site or services, a cookie helps the Site to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the Site, the information you previously provided can be retrieved, so you can easily use the features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Site when you visit. Additionally, depending on where you live, you may have the right to restrict certain cookies using the cookie banner on the Site.

### **Third-Party Links**

The Site contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they

leave our Site and to read the privacy statements of any other site that collects personally identifiable information.

## **Security and Retention of your Personal Information**

We take reasonable security measures to protect against unauthorized access to or alteration of your personal information. Notwithstanding the foregoing, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through the Site cannot be guaranteed. In the event that we are required by law to inform you of a breach to your personal information we may, at our discretion, notify you electronically, in writing, or by telephone, if permitted to do so by law.

Our Site permits you to create an account. If you create an account on the Site, you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

We retain your personal information for only as long as necessary to fulfill the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we obtained the information and whether we can achieve those purposes through other means, as well as applicable legal requirements.

## **Your Choices**

Subject to certain exceptions, and only for those individuals who meet specific jurisdictional and legal requirements, you have the right to make the following requests:

1. **Access to Your Personal Information.** You may request access to your personal information or confirmation that we have information about you. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
2. **Changes to Your Personal Information.** We rely on you to update and correct your personal information. Our Site will allow you to modify or delete your account profile. If our Site does not permit you to update or correct certain information, you can contact us at the address described below to request that your information be modified. You may

ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.

3. **Deletion of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for other business purposes.
4. **Opt-out of Selling or Sharing for Targeted Advertising.** You may opt-out of online tracking based targeted advertising (e.g., cookies) by clicking the “Reject” button in the “We value your privacy” window. Please note that if you change browsers or computers, or if you clear your browser’s cache, you may need to click the link again to apply your preference. You can also reject cookies on our cookie banner. Please note that not all sharing or disclosure of your personal information is a “sale” and not all sharing or disclosure is subject to the right to opt out.
5. **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below.
6. **Online Tracking.** We do not currently recognize the “Do Not Track” signal.
7. **Promotional Emails.** From time to time, Alpha Trading may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. If you would like to stop receiving marketing or promotional communications via email from Alpha Trading, you may opt out of such communications by clicking on the “unsubscribe” button found at the bottom of each email.
8. **Revocation of Consent.** Where we process your personal information based upon consent, you may revoke consent. Please note, if you revoke your consent for the processing of personal information then we may no longer be able to provide you with the Services.

To exercise any of your rights, you may email us at "alphatradingandrealestategroup@gmail.com, Attn: Arbaz Ansar. In some circumstances, you may authorize an agent to exercise your rights by emailing us on your behalf. If you use an agent to submit an opt out request, you must provide the agent with signed written permission demonstrating that they have been authorized by you to act on your behalf. We may require more information to ensure proper verification of you and your agent’s identity and authorization. Depending on your request, we will ask for information such as your name, information about the last interaction you had with us, or the date of your last purchase from us. We may also ask you to provide a signed declaration confirming your identity. If you are utilizing an agent, we require a signed and notarized permission from you stating that the agent has authorization to act on your behalf. We will deny the request if we are unable to verify the requestor or the authorized agent.

### **Changes to this Statement**

Alpha Trading reserves the right to amend this Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our website, and/or by updating any privacy information. Your continued use of the website and/or Services available after any such modifications will constitute your: (a) acknowledgment of the revised Policy; and (b) agreement to abide and be bound by such Policy as revised.

## Contact Information

Alpha Trading welcomes your questions or comments regarding this Statement. If you have any questions or comments, please contact Alpha Trading at:

Alpha Trading and Real Estate Group LLC

Attn: Data Protection Officer, Arbaz Ansar

701 S. Carson Street, Suite 200, Carson City, NV 89701, USA

Email Address: [alphatradingandrealestategroup@gmail.com](mailto:alphatradingandrealestategroup@gmail.com)

## Additional Information For California Residents

California law requires us to disclose the following additional information related to our privacy practices. If you are a California resident, the following privacy disclosures apply to you in addition to the rest of the Privacy Policy.

- **California Shine the Light.** If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, please submit a written request to us using the information in the Contact Information section above.
- **Notice of Collection.** The table below describes the categories of personal information we collect, disclose for a business purpose, “sell” and/or “share” (as those terms are defined by California law). Please note, in addition to the recipients identified below, we may disclose any of the categories of personal information we collect with government entities, as may be needed to comply with law or prevent illegal activity. Alpha Trading may sell or lease customer information to third parties for the following reasons:
  - Alpha Trading may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is transferred to the third party.

- Alpha Trading may, if we in our discretion consider it potentially beneficial to you, share personal data or information with our affiliates or trusted third-party partners in order to provide you with further educational, marketing and promotional offers we believe may be of interest to you. You are always entitled to opt-out from receiving such offers.
  
- **Fraud Prevention.** You explicitly consent to Alpha Trading sharing your personal information with other proprietary simulated trading firms or third parties for the purposes of detecting fraudulent, deceptive, malicious, or criminal behavior or any violations of our Terms or this Agreement.
  
- **California Sensitive Information Disclosure.** We collect the following categories of sensitive personal information (as defined under California law): your biometric data. This information is collected to process transactions, comply with laws, manage our business, or provide you with services. Note that we do not use such information for any purposes that are not identified within the California Privacy Rights Act Section 1798.121. We do not “sell” or “share” sensitive personal information for purposes of cross-context behavioral advertising.

**Effective Date: December 16, 2023.**

**Updated: June 15, 2024.**