

# Privacy Policy

**Effective Date:** September 5, 2025

## Introduction

WINER MEDIA FZCO (“WINER MEDIA”, “we”, “us”, or “our”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, and safeguard your personal data when you use **AI Master**, our digital product and learning platform hosted on Whop. We adhere to international data protection laws, including the EU General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA) (as amended by the CPRA), and the UAE Personal Data Protection Law (PDPL), to ensure your rights and information are protected. AI Master is hosted on the Whop platform, which means Whop processes and stores personal data on our behalf. (Please also review Whop’s own Privacy Policy for details on Whop’s data practices.) We also maintain a community space on Discord for AI Master users; note that any data you share on Discord is subject to Discord’s privacy policy, not this document. By using AI Master, you acknowledge that you have read and agree to this Privacy Policy.

## Information We Collect

We only collect personal data necessary to provide and improve our services. This includes:

- **Account Information:** When you purchase or register for AI Master on Whop, we collect information you provide, such as your name, email address, username, and contact details. This is used to create and manage your user account.
- **Payment & Transaction Data:** If you subscribe to AI Master, payment processing is handled by Whop’s payment providers. We do **not** directly store your credit card or payment details. We receive records of your orders and subscription status (e.g. the fact that you purchased or renewed a membership, transaction dates and amounts) but not your full payment card information. This information allows us to confirm your purchase and provide you access to the paid features.

- **Usage and Analytics Data:** When you use AI Master on the Whop platform, Whop automatically collects certain behavioral and technical data about your visit. This includes information such as which pages or content you view, features you use, clicks on links, the time spent on different sections, and other usage metrics. It also includes device and network information like your IP address, general location, browser type, device type or ID, and operating system. Whop uses cookies and similar technologies to gather this data. We receive these analytics to understand how users interact with our platform, troubleshoot issues, and improve our services. (See **Cookies and Analytics** below for more details.)
- **Communications:** If you contact us for support or respond to surveys/feedback requests, we will collect the information you provide in those communications. This may include your name, email, and the content of your message or inquiry. We use this data to assist you and to improve customer service.

We do *not* collect any sensitive personal data (such as government ID numbers, health information, etc.) through AI Master. We also do not knowingly collect any information from children or minors (see **Minors' Data** below). All personal data we collect is provided by you directly or generated through your interactions with the platform; we do not obtain personal data from third-party data brokers.

## How We Use Your Information

We use personal data for the following purposes, and we strive to do so in a manner consistent with applicable privacy laws:

- **Providing the Service:** To provide you with access to AI Master's content and features, manage your subscriptions, authenticate your account, and deliver the services you expect. For example, we use your account data to log you in and display your available course materials.
- **Processing Transactions:** To process membership purchases, renewals, or cancellations and to keep records of your payments. (Payments are handled by Whop's integrated payment system, but we use the transaction info to activate your membership and maintain subscription status.)
- **Customer Support:** To communicate with you and respond to your inquiries or requests. For instance, if you contact us for help, we will use your email and issue details to assist you. We may also send you important administrative notifications (such as updates about your account, password resets, or critical

service announcements).

- **Improvement and Analytics:** To analyze platform usage and performance so we can improve AI Master. We review the behavioral/analytics data (e.g. which lessons are most accessed, completion rates, or feature usage patterns) to understand user preferences and troubleshoot technical issues. This helps us optimize content, develop new features, and enhance user experience. We may also use aggregated, anonymized usage information for internal research and business analytics.
- **Communication & Updates:** To send you service-related updates or informational messages. This may include newsletters, product updates, or offers for new features or products **if** you have opted-in to receive such marketing communications. We will only send you marketing emails with your consent, and you can unsubscribe at any time.
- **Security and Fraud Prevention:** To protect the integrity of our platform, users, and business. For example, we may monitor usage data to detect unauthorized access or fraudulent activity and take steps to prevent abuse. IP addresses and device information may be used to help identify and block malicious actors, keep your account secure, and enforce our Terms of Service.
- **Legal Compliance:** To fulfill our legal obligations. We may process and retain certain data to comply with laws and regulations (for example, maintaining transaction records for tax and accounting requirements or responding to lawful requests by authorities). We also may use or disclose personal data where necessary to establish or exercise our legal rights, defend against legal claims, or as otherwise required by law.

We will not use your personal information for purposes that are incompatible with those above without asking for your permission first. In particular, **we do not use personal data for any kind of automated decision-making** that produces legal or similarly significant effects on you (such as profiling for credit decisions or hiring) – AI Master is a learning platform and human involvement governs any important decisions.

## Legal Bases for Processing (GDPR/PDPL)

If you are located in the EU/EEA, UK, or other regions with similar laws, we must have a valid legal basis to process your personal data. We rely on the following legal grounds:

- **Performance of a Contract:** We process personal data as needed to provide our services under our agreement with you. For example, we need your account and payment information to register you and grant you access to AI Master's paid content. This is generally the primary legal basis for our data processing.
- **Consent:** We will ask for your consent in situations where it is required. For instance, if we want to send you promotional emails, we will do so only with your consent. You have the right to withdraw consent at any time, and if you do so, we will stop the processing that was based on consent.
- **Legal Obligation:** Some data processing is necessary for us to comply with our legal obligations. For example, we may retain transaction records or disclose information if required by financial regulations, tax laws, or a court order.
- **Legitimate Interests:** We may process your data for our legitimate business interests, only if those interests are not overridden by your data-protection rights. For example, it is in our interest (and yours) that we analyze and improve our services, or prevent fraud and secure our platform. We perform such analytics or security monitoring in a way that respects your privacy, and we ensure minimal impact on your rights. *(Please note: under the UAE PDPL, "legitimate interest" is not recognized as an independent legal basis for processing. Therefore, if you are in the UAE, we rely on alternative legal bases – such as contractual necessity or your consent – for processing that might otherwise be based on legitimate interests in other jurisdictions.)*
- **Other Bases:** In rare cases, we may need to process personal data to protect someone's vital interests (an emergency situation) or if it's in the public interest or exercise of official authority, but these scenarios are unlikely in the context of AI Master.

## Cookies and Analytics

**Cookies:** Whop's platform uses cookies and similar technologies to ensure the website functions correctly and to collect analytics data. Cookies are small text files stored on your device that help remember your preferences, keep you logged in, and gather information about how you use the platform. When you use AI Master on Whop, you will receive Whop's essential cookies (for example, to maintain your session). You may also encounter analytics cookies that Whop uses to track user interactions on the platform.

**How We Use Analytics Data:** The analytics information provided by Whop helps us understand overall user engagement and improve our content. For example, we can see aggregated data on popular course sections or where users drop off, which guides our enhancements. All such analysis is done in compliance with this Privacy Policy and is only used internally to better the user experience.

**Your Choices:** Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies or notify you when a cookie is being placed. Please be aware that if you disable or delete cookies, some features of the Whop platform (including login and access to AI Master content) may not function properly. Since we do not use any non-essential third-party cookies, there is currently no separate “cookie opt-out” mechanism needed for AI Master beyond your browser controls. By continuing to use our platform, you consent to the placement of cookies as described, unless you disable them.

## Data Sharing and Disclosure

We treat your personal information with care and do not share it except as necessary to run our service or as required by law:

- **Service Providers (Processors):** We share data with third-party service providers that help us operate AI Master. The primary such service is **Whop**, which acts as our platform host and processes user data (account info, payments, etc.) on our behalf. Whop and its subcontractors (e.g. payment processors, cloud hosting providers) have access to personal data only to perform their functions (like processing a payment or storing data) and are contractually obligated to protect it. We may also use other providers for specific services, such as an email delivery service to send newsletters (if you’ve subscribed) or analytics tools provided within Whop. Any service providers we use are bound by confidentiality and data protection agreements and cannot use your data for their own purposes.
- **Legal Requirements and Safety:** We may disclose personal information if we are legally required to do so – for example, in response to a subpoena, court order, or other government demand. We may also share data if we believe in good faith that it’s necessary to: comply with applicable laws or regulations; investigate or defend against legal claims; protect the rights, property, or safety of WINER MEDIA, our users, or the public; or enforce our Terms of Service or other agreements.

- **Business Transfers:** If WINER MEDIA FZCO undergoes a business transaction such as a merger, acquisition, corporate reorganization, or sale of assets, user information (including personal data) may be transferred to the successor or new owner as part of that transaction. In such cases, we will ensure that your personal data remains subject to confidentiality obligations and this Privacy Policy (unless you're notified otherwise and consent to any new policy).
- **With Your Consent:** We will share your personal data with third parties outside of the above circumstances only if you give us explicit permission to do so. For instance, if in the future you choose to link your AI Master account with another service or request that we share data with a partner, we will do so only with your authorization.

**No Selling of Personal Data:** We do **not** sell your personal information to any third parties, and we do not share your personal data for cross-context behavioral advertising (as “sell” or “share” are defined under CCPA). In the past 12 months, we have not sold any personal data and have no plans to do so. Your information is used solely to provide and improve AI Master, not to generate advertising revenue. (If this ever changes, we would update this Policy and provide required notices and opt-out options.)

## Data Retention

We retain personal data only for as long as necessary to fulfill the purposes described in this Policy, unless a longer retention period is required or permitted by law. In practice:

- **Account Data:** If you have an active account or subscription with AI Master, we will retain your personal information for as long as it is needed to maintain your account and provide you with the service.
- **Subscription Records:** We keep records of your purchases and subscription history while your membership is active. If you cancel your subscription or your access expires, we may retain those records for a certain period (for example, for accounting and tax purposes).
- **Support Communications:** Communications you send to us (emails, support tickets) may be kept as long as needed to address your request and for a short period thereafter in case you have follow-up questions. Important or legally significant communications may be retained longer if necessary (e.g., a record of customer support regarding a billing issue might be kept for financial audit

purposes).

- **Retention After Account Deletion:** If you choose to delete your AI Master account (or request that we delete your data), we will remove or anonymize personal data associated with your account, barring information we are required to keep. In general, upon a verified deletion request, we aim to delete personal data within approximately 30 days from our active systems, unless legal obligations require retention. Some residual data may temporarily remain in backup archives but will be purged according to our backup retention schedule.
- **Legal and Regulatory Retention:** Certain information will be retained longer where necessary to comply with laws and regulations. For example, financial transaction records and invoices may be kept for a number of years (e.g., up to 5–7 years, depending on local laws) to satisfy tax, audit, and financial reporting requirements. We may also retain information as needed to resolve disputes or enforce our agreements, but only for as long as necessary for those purposes.

After the applicable retention period ends, or if the data is no longer needed, we will either securely delete your personal data or irreversibly anonymize it. If data is anonymized such that it can no longer be linked to an individual, it is no longer considered “personal data” and we may retain it indefinitely for analytical or statistical purposes. For example, we might keep aggregated platform usage statistics (with all personal identifiers removed) to help us understand long-term trends, but in that case no individual user could be identified from that data.

## Your Privacy Rights

You have rights regarding your personal data. These rights may vary depending on your jurisdiction, but we extend many core rights to all our users. We are committed to honoring your rights as follows:

- **Right to Access:** You have the right to request a copy of the personal data we hold about you, as well as to obtain information about how we process it. This is sometimes called a “data subject access request.” We will provide you with your data in a readable format, explaining the categories of data, the purposes of processing, and any third parties with whom it’s shared (as required by law). This right is available under GDPR and UAE PDPL, and similarly California residents have a right to know what personal information has been collected and to obtain specific pieces of information.

- **Right to Rectification:** If any of your personal data is inaccurate or incomplete, you have the right to ask us to correct or update it. We encourage you to keep your account information up-to-date. Under GDPR and PDPL, we must rectify incorrect data upon your request, and California’s CPRA also provides a right to correction of inaccurate personal info.
- **Right to Erasure:** You can request that we delete your personal data. This is also known as the “right to be forgotten” under GDPR. If you no longer want us to have your information, you can request deletion (for example, of your account). We will honor such requests and erase your data, provided we don’t have a legal obligation to retain it (see **Data Retention** above for examples of data we might need to keep). In certain cases, we may anonymize data rather than delete it, if allowed, but in either case we will cease to identify you in our systems.
- **Right to Restrict or Object to Processing:** You have the right to restrict our processing of your data or to object to certain types of processing.
  - *Restriction:* For instance, if you contest the accuracy of your data or have objected to processing (see below), you can ask us to limit processing while your request is being resolved. We will then only store your data but not actively use it until the issue is resolved.
  - *Objection:* You can object to processing that is based on our legitimate interests or performed for direct marketing. If you object, and the processing is not based on an overriding compelling reason, we will stop the processing. Under GDPR, you can object to any processing for marketing at any time (we will always honor opt-outs from marketing). Under UAE PDPL, you similarly have the **right to stop processing** of your personal data in certain situations. *(Note: If you are in the EU or UAE, we generally will not rely on “legitimate interest” for any processing that would be considered intrusive or unexpected, and we do not do marketing without consent, so objections would typically apply only to minimal analytics or improvement tasks. Regardless, you have the right to object.)*
- **Right to Data Portability:** You have the right to obtain your personal data in a portable, commonly-used electronic format, and to have it transmitted to another service provider where technically feasible. In other words, you can ask us for a copy of the data you provided to us, in a format that you could re-use elsewhere. We will provide this either directly to you or to a third party you designate, where

possible. This right is provided under GDPR and UAE PDPL. (For example, if you want a copy of your course progress data to import into another platform, we would work with you to export it in a usable format.)

- **Right Not to be Subject to Automated Decisions:** As noted above, we do not make automated decisions that have legal or similar significant effects on individuals. Under GDPR and UAE PDPL, you are protected from being subject to purely automated decisions (like algorithms deciding things without human involvement) that significantly affect you. In any event, AI Master does not engage in such automated decision-making about our users.
- **Right to Withdraw Consent:** If we are processing any of your personal data based on your consent, you have the right to withdraw that consent at any time. For example, if you consented to receive marketing emails, you can opt out later (using the unsubscribe link in emails or by contacting us). Withdrawing consent will not affect the legality of processing we conducted prior to withdrawal, and it won't affect processing under other legal bases. It simply means we will stop the specific activities that relied on consent.
- **California Privacy Rights:** If you are a California resident, you have some additional rights under the CCPA/CPRA:
  - **Right to Know:** Largely equivalent to the access right above – you can request more detailed disclosures about the categories of personal information we have collected, the sources of that information, the business purpose for collection, and the categories of third parties with whom we shared it. We have provided much of this information in this Privacy Policy. You also have the right to request the specific pieces of personal information we have about you (which would be fulfilled through an access request).
  - **Right to Delete:** Similar to the erasure right – you can request deletion of personal information we collected from you, with certain exceptions (for example, if keeping the data is necessary to complete a transaction you initiated or to comply with a legal obligation). We will honor deletion requests to the fullest extent required by law.
  - **Right to Correct:** You have the right to request correction of inaccurate personal information we hold about you (this was introduced by the

CPRA). This aligns with the rectification right described above.

- **Right to Opt-Out of Sale/Sharing:** You have the right to direct us **not** to sell your personal information or share it for cross-context behavioral advertising. As noted, we do not sell personal data, and we do not share it for targeted advertising, so by default your data is not being sold or shared in that way. If we ever consider selling data, we will provide a clear opt-out mechanism on our site (“Do Not Sell or Share My Personal Information”).
- **Right to Non-Discrimination:** We will never discriminate or retaliate against you for exercising any of your privacy rights. This means we will not deny you our service, charge you a different price, or provide a lesser quality of service just because you exercised your rights under CCPA. The price and service will remain the same whether or not you choose to, for example, request deletion or opt out of data sharing.
- **UAE Privacy Rights:** If you are a user in the United Arab Emirates, the PDPL guarantees you rights very similar to those under GDPR. These include rights to access your data, correct it, delete it, restrict or stop processing, and object to certain uses, as described above. UAE citizens’ data is protected under PDPL no matter where it is processed, and we extend the same compliance measures to you. You also have the right not to have your personal data used for direct marketing purposes without consent and the right not to be subject to automated decisions, just as under GDPR. We note any differences in UAE law (such as the lack of a “legitimate interest” basis) in relevant sections of this Policy.

**Exercising Your Rights:** You may contact us at any time to exercise any of the rights above, or to ask questions about your rights. To make a request, please see the **Contact Us** section at the end of this Policy for how to reach us. We will respond to your request as soon as possible and no later than the timeframe required by law. This is generally within **one month** for EU/UK/UAE requests (with a possibility to extend by two further months if necessary, in which case we will inform you of the extension and the reason). For California residents, CCPA requires us to respond within **45 days** (with a possible 45-day extension in certain cases). We will verify your identity before fulfilling a rights request to ensure that we do not disclose or delete data to the wrong person. This might involve asking you to confirm account details or provide identification information. There is no fee for making a request, though if requests become excessive or manifestly unfounded, applicable law allows us to refuse or charge a reasonable fee (we will inform you if that situation arises). Rest assured, we will honor your rights to the fullest extent and in accordance with applicable law.

If you have any concerns about how we handle your data or your requests, you also have the **right to lodge a complaint** with a supervisory authority. For EU users, this would be your national Data Protection Authority (DPA) or the lead DPA in the country of our EU representative (if applicable). For UK users, it's the Information Commissioner's Office (ICO). For UAE users, you can contact the UAE Data Office or other relevant regulatory body. For California residents, you can contact the California Privacy Protection Agency or the state Attorney General. Of course, we would appreciate the chance to address your concerns directly first, and we will do our best to resolve any issues.

## Cross-Border Data Transfers

AI Master is offered globally, so your personal data may be transferred across international borders. In particular, our platform is hosted on **Whop's servers which are primarily located in the United States**. This means that personal information you provide (if you are outside the U.S.) will be transmitted to and stored on servers in the U.S., and possibly accessed by our team in the UAE or elsewhere. The U.S. may not have data protection laws as strict as those in your home country (for example, the EU or UAE), but we take steps to ensure an adequate level of protection for your information in accordance with applicable law.

For **EU/EEA (GDPR) Users**: Whenever we transfer personal data out of the European Economic Area, we will implement appropriate safeguards as required by GDPR. Our primary safeguard is the use of **Standard Contractual Clauses (SCCs)** – these are legal contracts approved by the European Commission that commit the recipient of the data (e.g., Whop and any relevant service providers) to protect your personal information to EU standards. We have ensured that our data processing agreement with Whop includes the necessary SCC provisions for EU data exports. In addition, Whop may rely on other mechanisms or certifications if available (such as the EU-U.S. Data Privacy Framework, if applicable in the future). We will only transfer European users' data in compliance with Chapter V of the GDPR, and you can request a copy of the relevant transfer safeguards if needed.

For **UAE Users**: The UAE PDPL also places restrictions on transferring personal data outside the UAE. We comply with Article 22 of the PDPL, which means we will only transfer your data abroad if the destination country has been deemed to have an adequate level of protection, or if we have put in place **appropriate measures** to protect the data. Since the U.S. does not yet appear on any UAE "adequacy" list (as of this Policy's effective date), we rely on contractual and technical safeguards similar to the EU's SCCs to ensure your data is secure during international transfer. These measures contractually bind the receiving parties to protect your data according to

standards comparable to UAE law. We may also obtain your explicit consent for cross-border transfers when required. By using AI Master, you are authorizing us to transfer your data to our servers and service providers in the U.S. and other jurisdictions as necessary to provide the service, but always with your data protected as described.

For **other regions** (UK, Switzerland, etc.), we apply similar safeguards in line with those regions' requirements (such as UK International Data Transfer Agreements or other model clauses).

In all cases, we will take reasonable steps to ensure your privacy rights continue to be protected when your personal data is transferred internationally. If you have questions about international data transfers or require more information about the safeguards we use, please contact us.

## Security Measures

We understand the importance of securing your personal information. We have implemented a variety of **technical and organizational measures** to protect your data from unauthorized access, disclosure, alteration, or destruction. These include:

- **Encryption:** We rely on Whop's secure infrastructure, which employs encryption in transit (HTTPS/TLS) for data transmitted between your device and the platform. This helps ensure that personal data (like your login credentials or payment details) is encrypted while it's being sent over the internet.
- **Network and Application Security:** Whop's platform is built with security measures such as firewalls, intrusion detection systems, and regular security audits. We keep the software powering our services up-to-date with security patches to reduce vulnerabilities.
- **Access Controls:** Personal data is accessible only to those who need it to perform their duties. For example, our staff can only access your data on a need-to-know basis (such as providing support or resolving an account issue). Both WINER MEDIA and Whop maintain strict access controls, and our team members are trained on confidentiality and data protection.
- **Data Minimization:** We collect only the data we truly need to run AI Master, which inherently limits exposure. Additionally, we pseudonymize or anonymize data where feasible – for instance, using user IDs instead of names in analytic reports – to protect your identity.

- **Monitoring and Testing:** Whop’s systems are monitored for suspicious activity, and security testing is performed regularly. In the event of any security incident or breach, we have procedures in place to address it promptly, including notifying users or authorities as required by law.

While we and our platform provider strive to protect your information with strong security measures, please note that **no method of transmission over the internet, or method of electronic storage, is 100% secure**. We cannot guarantee absolute security of your data. However, we continuously evaluate and update our security practices to adapt to new threats and technologies. You also play a role in keeping your data safe: we urge you to use a strong, unique password for your AI Master/Whop account and to keep your login credentials confidential. If you believe your account has been compromised or if you have any security-related concerns, please contact us immediately so we can assist.

## Minors’ Data

**AI Master is intended for adults only.** You must be **18 years of age or older** to use our platform and purchase our services. We do not knowingly collect personal information from anyone under the age of 18. Our content and services are not directed at children or minors. If you are under 18, you are not authorized to use AI Master or provide any personal data to us.

In the unlikely event that we discover we have collected personal information from someone under 18, we will take prompt steps to delete that information from our records. If you are a parent or guardian and you believe your minor child has provided personal data to us, please contact us immediately so that we can remove the data and terminate the child’s account if applicable. We recognize the special obligation to protect children’s privacy and comply with laws aimed at protecting minors (such as COPPA in the United States, which applies to children under 13, and similar principles globally). By using AI Master, you confirm that you are at least 18 years old.

## Changes to This Privacy Policy

We may update or revise this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. When we make changes, we will update the “Effective Date” at the top of this Policy. For significant changes, we may also provide a more prominent notice of the update (such as via email notification or a message on our Whop page) so that you are informed.

We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your information. Any changes will become effective when posted, unless otherwise required by law. If you continue to use AI Master after a revised Privacy Policy has been posted, it means you accept the updated terms. If we seek to use your personal data for a new purpose that is not compatible with the purposes for which we originally collected it, we will obtain your consent where required or provide you with an opportunity to opt out.

## Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please do not hesitate to contact us. We are here to help and address any issues related to your privacy.

WINER MEDIA FZCO values your privacy and trust. **Thank you for reading our Privacy Policy.** If anything is unclear or if you need further information, feel free to contact us. We appreciate the opportunity to serve you and are committed to safeguarding your personal data at every step.