

# AMPMPicks.Inc (d/b/a “AMPM\_PICKS”) – Privacy Policy

Effective Date: September 28, 2025

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## 1) Who We Are

AMPMPicks.Inc, doing business as “AMPM\_PICKS” (“Company,” “we,” “our,” “us”), is a Florida, USA company. This Privacy Policy explains how we collect, use, disclose, and protect personal information when you access our websites, Whop storefront, Telegram/Discord groups, email communications, dashboards, and related services (collectively, the “Services”).

## 2) Scope

This Policy applies to personal information we process as a “controller” for our own purposes. It does not cover third-party sites or services we do not control. Your use of the Services is also subject to our Terms of Service.

## 3) Age Requirement

Our Services are intended only for individuals **\*\*21+\*\*** (or the higher legal age where you reside). We do not knowingly collect personal information from anyone under the applicable age. If you believe a minor has provided data to us, contact us and we will take appropriate steps to delete it.

## 4) Categories of Personal Information We Collect

Depending on how you interact with us, we may collect:

- **\*\*Account & Identity Data:\*\*** name, username/handle, email, phone (optional), country/state, and verification data (if required).
- **\*\*Transaction & Billing Data:\*\*** product purchased, plan tier, dates, price, last 4 of card (if shown by processor), transaction IDs. **\*\*Payment card details are collected and processed by payment processors (e.g., Whop’s processor/Stripe/PayPal) and not stored by us.\*\***
- **\*\*Communications & Support:\*\*** messages you send us, support tickets, survey responses, testimonials/endorsements.
- **\*\*Usage & Device Data:\*\*** IP address, device identifiers, browser type, operating system, referring URLs, page views, links clicked, timestamps, log files, and basic diagnostics.
- **\*\*Cookie/Tracking Data:\*\*** first-party cookies or similar technologies that help operate the Services, keep you signed in, measure performance, and prevent abuse.
- **\*\*Community/UGC:\*\*** posts or messages you submit within our private groups or channels (e.g., Telegram/Discord).
- **\*\*Referral/Affiliate Data (if applicable):\*\*** referrer codes, campaign IDs, and attribution parameters.
- **\*\*Legal/Compliance Data:\*\*** information necessary to fulfill legal obligations (e.g., records of consent, opt-out requests, fraud screening signals).

We do **\*\*not\*\*** knowingly collect sensitive personal information (e.g., precise geolocation, health, biometric, or government ID numbers) unless you voluntarily provide it or law requires it (e.g., identity checks for fraud prevention). Please do not submit sensitive data you do not want processed.

## 5) Sources of Personal Information

- Directly from you (account signup, purchases, messages).
- Automatically from your device/browser and our systems.
- From service providers and platforms we use to operate the Services (e.g., Whop, Telegram, Discord, email service, analytics, payment processors).

## 6) How We Use Personal Information (Purposes)

- **Provide & operate** the Services, including access control to private channels and delivery of digital content.
- **Account management** and customer support.
- **Transaction processing** and fraud prevention (through service providers).
- **Security & abuse prevention**, including logging and rate limiting.
- **Analytics & service improvement** (aggregate/anonymous reporting where possible).
- **Communications** (transactional notices; optional marketing with your preferences).
- **Legal compliance** (e.g., recordkeeping, responding to lawful requests).

## 7) Lawful Bases (EU/EEA, UK & similar jurisdictions)

Where required by law, we rely on one or more of the following legal bases: (a) **contract** (to provide the Services you request); (b) **legitimate interests** (security, fraud prevention, analytics, improving Services, and certain communications); (c) **consent** (where required, e.g., certain marketing or cookies); and (d) **legal obligations**.

## 8) Cookies & Similar Technologies

We use essential cookies to operate and secure the Services, and limited analytics cookies to understand performance (often in aggregated form). You can manage cookies via your browser settings. Blocking cookies may impact functionality. If we deploy a cookie banner on certain properties, your settings there will control non-essential cookies.

## 9) Sharing & Disclosure

We do **not sell** your personal information. We share the minimum necessary with:

- **Service Providers/Processors** who help us operate the Services (e.g., Whop, payment processors like Stripe/PayPal, email and CRM tools, cloud hosting, analytics, fraud prevention, and communication platforms such as Telegram/Discord). They are contractually obligated to use data only to provide services to us.
- **Affiliates & Business Transfers:** if we engage in a merger, financing, acquisition, or sale of assets, your data may be transferred as part of that transaction, subject to this Policy.
- **Legal & Safety:** when required by law, subpoena, or to protect rights, safety, or the integrity of the Services (including investigating fraud/abuse).

We do **not** engage in cross-context behavioral advertising (“sharing” under some U.S. state laws). If this changes, we will update this Policy and provide required choices.

## 10) International Data Transfers

We may process and store information in the United States and other countries. Where required, we use appropriate safeguards (e.g., Standard Contractual Clauses, service-provider agreements) for cross-border transfers.

## 11) Data Retention

We retain personal information for as long as necessary to (a) provide the Services; (b) comply with legal, tax, and accounting requirements; (c) resolve disputes; and (d) enforce agreements. Retention periods vary by category and business need. When no longer needed, we take reasonable steps to delete or de-identify data.

## 12) Security

We implement commercially reasonable technical and organizational measures designed to protect personal information. However, no method of transmission or storage is 100% secure. You are responsible for safeguarding your account credentials and promptly notifying us of suspected compromise.

### 13) Your Privacy Rights

Depending on your location, you may have some or all of the following rights (subject to exceptions and verification):

- **Access** (know whether we process your data and obtain a copy).
- **Deletion** (request we delete personal information).
- **Correction** (ask us to correct inaccurate information).
- **Portability** (receive certain data in a portable format).
- **Restriction/Objection** (object to or restrict certain processing, including where based on legitimate interests).
- **Withdraw Consent** where processing is based on consent.
- **Opt out of marketing** communications at any time (using unsubscribe links or by contacting us).

U.S. State Rights (e.g., CA/VA/CO/CT/UT): You may have rights to access, delete, correct, and opt out of sale/sharing/targeted advertising (we do **not** sell or share). You also may have the right to appeal our decision regarding a privacy request. To exercise rights, follow the instructions below.

EU/UK Residents: You also have the right to lodge a complaint with your local supervisory authority (e.g., ICO in the UK or your national DPA in the EU).

### 14) How to Exercise Your Rights

Submit requests by emailing [ampmpicks@gmail.com](mailto:ampmpicks@gmail.com) with the subject "Privacy Request." Provide your account email, the right(s) you wish to exercise, and any details needed to locate your data. We will verify your identity (e.g., by confirming control of the account email). Authorized agents (where applicable by law) must provide proof of authority and we may still require user verification. We will respond within the timelines required by applicable law.

### 15) Communications Preferences

Transactional emails (e.g., purchase confirmations, access notices) are necessary to provide the Services and cannot generally be opted out of. You can opt out of **marketing** emails at any time via the unsubscribe link in the message or by contacting us.

### 16) Do Not Track & Global Privacy Control

Some browsers offer "Do Not Track" or "GPC" signals. Our Services currently do not respond to DNT signals. Where **GPC** is treated as a valid opt out signal under local law, we will honor it to the extent legally required and technically feasible on the properties we control.

### 17) Community Areas (Telegram/Discord/Groups)

Anything you post in community areas may be visible to other members of that area. Consider your privacy before sharing. We may moderate or remove content that violates our Terms, but we do not control third party platforms' own data practices. Review Telegram/Discord privacy policies for details.

### 18) Third Party Links & Services

Our Services may link to or integrate with third party services (e.g., sportsbooks, news, odds providers). We are not responsible for their privacy or security practices. Review their policies before interacting.

### 19) Children's Privacy

We do not knowingly collect data from anyone under **21** (or higher legal age). If we become aware that we have collected personal information from an ineligible user, we will delete it.

### 20) Automated Decision Making/Profiling

We do not engage in automated decision making that produces legal or similarly significant effects. We may

perform limited analytics and anti-fraud screening that does not have such effects.

#### 21) Changes to This Policy

We may update this Policy periodically. When we do, we will revise the "Last Updated" date. Material changes may be announced via email or in-product notice where appropriate. Your continued use of the Services after changes take effect signifies acceptance.

#### 22) Contact Us

If you have questions or complaints about this Policy or our practices, contact: **\*\*ampmpicks@gmail.com\*\***

Mailing Address / Service of Process: **\*\*AMPMPicks.Inc (d/b/a AMPM\_PICKS), Legal Dept., Miami, Florida, USA\*\*** (insert full street address when available).