

PRIVACY POLICY

Personal information and your rights

Updated September 5, 2026. Read together with the other Orderflow Haus legal policies.

INTRODUCTION AND IDENTITY OF THE DATA CONTROLLER

This Privacy Policy ('Policy') is issued by Orderflow Haus, operated by xJMacD ('we,' 'us,' 'our,' or 'Data Controller'). It describes how we collect, use, store, share, and protect personal data relating to individuals ('you,' 'user,' or 'Data Subject') who access our services through Whop, Discord, or any other platform through which Orderflow Haus operates.

For the purposes of the General Data Protection Regulation (EU) 2016/679 ('GDPR'), the UK General Data Protection Regulation ('UK GDPR'), and all other applicable data protection legislation, Orderflow Haus acts as the Data Controller in respect of personal data collected directly through our services.

This Policy describes our privacy practices and rights that may apply under the GDPR, UK GDPR, the California Consumer Privacy Act ('CCPA'), and other applicable laws, depending on your location and the scope of those laws. By accessing or using our services, you acknowledge that you have read and understood this Policy.

LEGAL BASIS FOR PROCESSING (GDPR ARTICLE 6)

We only process your personal data where we have a valid legal basis to do so. The legal bases we rely upon are as follows:

- Contract Performance (Article 6(1)(b)): Processing necessary to deliver your subscription, manage your account, process payments, and provide access to our services.
- Legitimate Interests (Article 6(1)(f)): Processing necessary for our legitimate business interests, including community moderation, fraud prevention, abuse detection, service improvement, and the enforcement of our Terms and Conditions
- provided such interests are not overridden by your fundamental rights and freedoms.
- Legal Obligation (Article 6(1)(c)): Processing necessary to comply with applicable laws, including financial recordkeeping requirements, tax obligations, and responses to lawful requests from public authorities.

- Consent (Article 6(1)(a)): Where we rely on consent as a legal basis, you have the right to withdraw that consent at any time without affecting the lawfulness of processing carried out prior to withdrawal. Withdrawal of consent may be exercised by contacting us through the channels listed in the Contact section of this Policy.

Where we process special categories of personal data (Article 9 GDPR), we will identify and rely upon an appropriate additional legal basis, including your explicit consent where required.

INFORMATION WE COLLECT

Information You Provide Directly

- Username, display name, and profile information associated with your Whop or Discord account.
- Email address, where provided during account registration or direct communication.
- Payment information, processed exclusively by Whop's payment infrastructure and third-party processors (e.g., Stripe). We do not directly collect, store, or have access to full payment card numbers or bank account details.
- Messages, posts, and content you submit within our Discord server or via Whop's messaging system.
- Information submitted when contacting us for support, including the content of your communications.

Information Collected Automatically

- Subscription status, access timestamps, and usage data generated through Whop's platform infrastructure.
- Discord activity data visible to server administrators, including message history, role assignments, and server join/leave events, as permitted by Discord's API and platform architecture.
- Technical data such as IP address, device type, browser type, and operating system, where collected by Whop's or Discord's underlying infrastructure.

We do not collect sensitive personal data (special categories under Article 9 GDPR) unless you voluntarily provide such information in communications, in which case we will treat it with appropriate care and rely on explicit consent as the legal basis for any processing.

HOW WE USE YOUR PERSONAL DATA

We process your personal data for the following purposes and on the corresponding legal bases:

- Providing and managing your subscription and access to services. [Legal basis: Contract Performance]
- Processing payments and maintaining transaction records. [Legal basis: Contract Performance / Legal Obligation]

- Communicating with you about your account, subscription changes, support requests, and policy updates. [Legal basis: Contract Performance / Legitimate Interests]
- Enforcing our Terms and Conditions, Refund Policy, and community server rules, including investigating violations and applying sanctions. [Legal basis: Legitimate Interests]
- Moderating the Discord server and maintaining community standards. [Legal basis: Legitimate Interests]
- Detecting, preventing, and responding to fraud, abuse, chargebacks, and other unlawful activity. [Legal basis: Legitimate Interests / Legal Obligation]
- Improving our services, educational content, and community experience through aggregated or anonymized analysis. [Legal basis: Legitimate Interests]
- Complying with applicable legal obligations, court orders, and regulatory requirements. [Legal basis: Legal Obligation] We will not use your personal data for purposes materially incompatible with those listed above without first providing notice and, where required, obtaining your consent.

THIRD-PARTY PLATFORMS AND DATA PROCESSORS

We engage third-party platforms and service providers who may process your personal data on our behalf ('Data Processors') or as independent Data Controllers. We only engage processors who provide sufficient guarantees of GDPR-compliant data handling.

- Whop (whop.com): Subscription management, payment processing, and account infrastructure. Whop acts as an independent Data Controller in respect of data it collects through its platform. Please refer to Whop's Privacy Policy.
- Discord (discord.com): Community server communication infrastructure. Discord acts as an independent Data Controller in respect of data processed through its platform. Please refer to Discord's Privacy Policy.
- Payment Processors (e.g., Stripe): Financial transaction processing. These processors are subject to PCI-DSS compliance and their own privacy frameworks.

Where we share data with processors acting on our behalf, we do so under Data Processing Agreements ('DPAs') that impose obligations consistent with Article 28 of the GDPR. We do not sell your personal data to any third party for commercial purposes.

INTERNATIONAL DATA TRANSFERS

Our services are operated from the United States. If you are located in the European Economic Area (EEA), United Kingdom, or another jurisdiction with data transfer restrictions, please be aware that your personal data may be transferred to and processed in the United States or other countries that may not provide the same level of data protection as your home jurisdiction.

Where such transfers occur, we ensure appropriate safeguards are in place as required by Articles 44-49 of the GDPR, including:

- Reliance on third-party platforms (such as Whop and Discord) that rely on European Commission adequacy decisions, Standard Contractual Clauses (SCCs), or other approved transfer mechanisms under the GDPR.
- For transfers to the United States, reliance on the EU-U.S. Data Privacy Framework where applicable.

You may request further information about the specific transfer mechanisms applicable to your data by contacting us through the channels listed in the Contact section of this Policy.

DATA RETENTION

We retain personal data only for as long as is necessary to fulfill the purposes for which it was collected, to comply with our legal obligations, and to resolve disputes or enforce our agreements. Our retention periods are as follows:

- Subscription and transaction records: Retained for a minimum of seven (7) years in accordance with applicable financial and tax recordkeeping obligations.
- Support communications and exception request records: Retained for a minimum of three (3) years following resolution.
- Moderation and enforcement records (including ban records, chargeback records, and policy violation logs): Retained for a minimum of five (5) years, or indefinitely where necessary to protect legitimate interests.
- Discord message history: Subject to Discord's own data retention infrastructure and policies; we do not independently control the duration of Discord's storage of message data.

At the end of the applicable retention period, personal data is securely deleted or anonymized. Where anonymization is applied, the resulting data is no longer considered personal data and may be retained indefinitely for analytical purposes.

YOUR RIGHTS AS A DATA SUBJECT (GDPR ARTICLES 15-22)

If you are located in the EEA or United Kingdom, you have the following rights under the GDPR and UK GDPR, which you may exercise free of charge:

- Right of Access (Article 15): The right to obtain confirmation of whether we process your personal data and, if so, to receive a copy of that data along with information about how it is processed.
- Right to Rectification (Article 16): The right to request correction of inaccurate or incomplete personal data we hold about you.
- Right to Erasure / Right to be Forgotten (Article 17): The right to request deletion of your personal data where it is no longer necessary for the purposes for which it was collected, where you withdraw consent, or where processing is unlawful - subject to applicable legal exceptions.

- Right to Restriction of Processing (Article 18): The right to request that we restrict the processing of your personal data in certain circumstances, such as while accuracy is contested or an objection is being assessed.
- Right to Data Portability (Article 20): The right to receive personal data you have provided to us in a structured, commonly used, machine-readable format, and to transmit that data to another controller where technically feasible and legally applicable.
- Right to Object (Article 21): The right to object at any time to processing of your personal data based on legitimate interests or for direct marketing purposes. We will cease such processing unless we demonstrate compelling legitimate grounds that override your rights.
- Rights Related to Automated Decision-Making (Article 22): We do not subject users to solely automated decisions that produce significant legal or similarly significant effects. If this practice changes, we will notify you and provide appropriate safeguards.
- Right to Withdraw Consent (Article 7(3)): Where processing is based on consent, you have the right to withdraw that consent at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please submit a written request through the official Whop messaging system or the designated support channel in our Discord server. We will respond within one (1) month of receipt of your request, with the possibility of a two-month extension in cases of complexity, of which you will be informed. We may require verification of your identity before processing your request.

RIGHT TO LODGE A COMPLAINT

If you are located in the EEA or United Kingdom and believe that our processing of your personal data infringes applicable data protection law, you have the right to lodge a complaint with the relevant supervisory authority in your country of residence or the country where the alleged infringement occurred.

- EEA residents may contact the data protection authority in their EU Member State. A full list of EEA supervisory authorities is available at: edpb.europa.eu
- UK residents may contact the Information Commissioner's Office (ICO) at: ico.org.uk We would, however, encourage you to contact us in the first instance so that we may seek to resolve your concern directly.

CALIFORNIA RESIDENTS - CCPA RIGHTS

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), including the right to know what personal information is collected about you, the right to delete personal information, the right to correct inaccurate personal information, the right to opt out of the sale or sharing of personal information, and the right to non-discrimination for exercising your privacy rights.

We do not sell personal information as defined under the CCPA. To exercise your CCPA rights, please contact us through the channels listed below. We will respond within forty-five (45) days, with a possible extension of an additional forty-five (45) days where reasonably necessary.

WEBSITE, COOKIES AND THIRD-PARTY CONTENT

Orderflow Haus uses its website to present its services and provide access to Whop checkout. The website loads some fonts from Google Fonts, which means your browser requests those font resources from Google. Outside third-party checkout, the current website code does not set first-party cookies or include an analytics or advertising tracker.

Whop checkout loads when you choose to continue to checkout on our website. Your browser then connects directly to Whop and its payment providers, which process checkout and payment information under their own policies. Whop and Discord may use cookies, web beacons, or similar technologies under their own policies. We will update this notice and provide any legally required choices before introducing additional tracking or other material changes to data processing.

CHILDREN'S PRIVACY

Our services are not directed to individuals under the age of eighteen (18). We do not knowingly collect personal data from minors. If you are a parent or legal guardian and believe a minor has provided personal data to us without authorization, please contact us immediately. Upon verification, we will promptly delete such data and terminate the associated account in compliance with applicable law, including the Children's Online Privacy Protection Act (COPPA) where applicable.

DATA SECURITY

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, accidental loss, destruction, alteration, or disclosure, in accordance with Article 32 of the GDPR. These measures include access controls, account security practices, and reliance on the security infrastructure of our third-party platform providers.

Notwithstanding the foregoing, no transmission of data over the internet and no digital storage system is entirely secure.

We cannot guarantee absolute security, and you transmit information to us at your own risk.

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of affected individuals, we will notify the relevant supervisory authority within seventy-two (72) hours of becoming aware, as required by Article 33 of the GDPR, and will notify affected Data Subjects without undue delay where required by Article 34.

DATA PROTECTION BY DESIGN AND BY DEFAULT

Consistent with Article 25 of the GDPR, we apply the principles of data protection by design and by default. This means we consider data privacy implications when introducing new services or processing activities, limit data collection to what is strictly necessary for the specified purpose, restrict access to personal data to those who require it, and default to the most privacy-protective settings available within the platforms we use.

MODIFICATIONS TO THIS POLICY

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, legal requirements, or platform operations. Material changes will be communicated to users via a notice on our Whop page or within our Discord server at least fourteen (14) days prior to taking effect, where practicable. For changes required by law, notice will be provided as soon as reasonably possible.

Your continued use of our services following the effective date of any modification constitutes acceptance of the revised Policy. If you do not agree with the revised terms, you must discontinue use of our services.

CONTACT AND DATA CONTROLLER INFORMATION

If you have questions, concerns, or wish to exercise your data subject rights, please contact Orderflow Haus through the following official channels:

- Whop: Via the official Orderflow Haus Whop page messaging system.
- Discord: Via the designated support channel within the Orderflow Haus Discord server.

Please note that requests submitted through unofficial or unverified channels may not be acknowledged or actioned. We aim to respond to all legitimate privacy-related requests within the timeframes required by applicable law.

At this time, Orderflow Haus does not maintain a separate Data Protection Officer (DPO). If our processing activities change in a manner that triggers the DPO appointment requirement under Article 37 of the GDPR, we will designate a DPO and update this Policy accordingly.