

Privacy Policy

Whaleden, Inc. PRIVACY POLICY

Last Updated: April 20, 2026

Whaleden, Inc., 1111B S Governors Avenue, STE 21470, Dover, DE 19904, United States (the “Company,” “we,” “us,” or “our”) is committed to maintaining robust privacy protections for its users. This Privacy Policy (“Policy”) is designed to help you understand how we collect, use, and safeguard information when you use our Platform.

For purposes of this Policy, “Platform” refers to the website and services accessible at <https://collect.whaleden.com/>, including user accounts, crowdfunding campaigns, digital content purchases, and the rewards programs (including referral, cashback, membership tiers, points, and the Platform Rewards Pool). “You” refers to you as a visitor or registered user of the Platform.

By accessing or using the Platform, you accept this Privacy Policy and consent to the collection and use of information as described herein.

I. Information We Collect

We collect two types of information: Non-Personal Information, which cannot be used to personally identify you, and Personal Information, which can be used to identify you.

1. Information Collected Automatically

Like most websites, we automatically collect certain technical and usage data when you visit the Platform. This may include:

- The website from which you arrived (referring URL)
- Browser type and version
- Device type and operating system
- Date, time, and duration of your visit
- Pages viewed on the Platform
- Approximate geographic location based on IP address

We collect this data using cookies and similar technologies. Cookies are small text files stored on your device that allow us to recognize your browser across sessions. You may configure your browser to refuse cookies, though this may affect certain Platform features.

2. Information You Provide When Creating an Account

To use most features of the Platform, you must register for an account. During registration and in the course of using your account, we may collect:

- Email address, username, and password
- Name and date of birth (where required for age verification)
- Communication preferences (newsletters, notifications)

3. Information Collected for Purchases and Crowdfunding

When you make a purchase or support a crowdfunding campaign on the Platform, we collect information necessary to process your transaction, including:

- Billing name and address
- Order details, purchase history, and transaction records
- Payment method information – payment processing is handled by a third-party payment processor; we do not store complete payment card information on our servers

4. Information Related to Digital Content Access

For users who access digital content through their account, we may collect:

- Login and access logs
- Usage data related to content accessed through your account
- Support communications and troubleshooting data

5. Rewards Program Data

If you participate in the Platform's rewards programs, we collect data necessary to administer those programs, including:

- Referral links generated by or attributed to your account and the referral relationships between users
- Qualifying transactions that generate referral rewards, cashback, or tier progression
- Accrued rewards balances, cashback credits, membership tier status, and points (both active and lifetime)
- Engagement and activity data used to calculate points and eligibility for Platform Rewards Pool distributions

We treat referral relationships as private. Specifically:

- We do not publicly display the identities of users within your referral network
- We do not share or sell referral relationship data to third parties for their marketing purposes

- We do not use the referral graph to contact your referrals on your behalf or to target them with marketing outreach outside of Platform-related communications they have consented to receive
- Aggregate, anonymized referral statistics may be used internally and shared with partners, but individual referral relationships are not disclosed

6. Information Collected for Reward Withdrawals

When you request a withdrawal of accrued rewards, we collect the information necessary to process the payout, which may include:

- Payout method selected (for example, bank account or third-party payment service such as PayPal)
- Bank account details, account identifier, or other payout instrument information
- Tax identification information where required by applicable law

This information is shared with the relevant third-party payment service providers as necessary to execute the withdrawal. Those providers process your information in accordance with their own terms and privacy policies.

7. Children's Privacy

The Platform is not directed at children under the age of 13. We do not knowingly collect personal information from anyone under 13. If we learn that we have inadvertently collected such information, we will delete it promptly. If you believe we have collected information from a child under 13, please contact us at privacy@whaleden.com.

II. How We Use Information

Personal Information

We use personal information for the following purposes:

- Creating and maintaining your user account and authenticating your identity
- Processing purchases and crowdfunding contributions
- Delivering purchased digital content to your account
- Administering the Platform's rewards programs, including the referral program, cashback, membership tiers, points, and Platform Rewards Pool distributions
- Tracking user engagement and activity for the purposes of calculating points, determining tier progression, and allocating Rewards Pool distributions
- Processing withdrawal requests and facilitating reward payouts through third-party payment service providers

- Sending order confirmations, account notices, and service-related communications
- Sending promotional communications, if you have opted in
- Responding to customer support inquiries
- Improving and personalizing your experience on the Platform
- Detecting and preventing fraud, abuse of rewards programs, and unauthorized activity
- Complying with legal, tax, and regulatory obligations, including reporting of reward payments where required

Non-Personal Information

We use non-personal information to analyze usage trends, improve the Platform, and ensure technical performance. We may share aggregated, non-identifiable data with partners and service providers at our discretion.

III. How We Share Information

We do not sell, trade, or rent your personal information to third parties for their marketing purposes. We do not share or sell referral relationship data as described in Section I.5.

We may share personal information in the following circumstances:

Service Providers: We share information with vendors who perform services on our behalf, including payment processors, payout and withdrawal service providers (such as bank transfer processors and third-party payment services like PayPal), cloud hosting and storage providers, email service providers, analytics services, and customer support platforms. Our payment processor receives the billing and transaction data necessary to process your payments. Payout service providers receive the information needed to execute reward withdrawals. These vendors use your information only as directed by us and in accordance with this Policy.

Legal Requirements: We may disclose personal information if required by law, court order, or governmental authority, or if we have a good-faith belief that disclosure is necessary to protect the rights, property, or safety of our users or the public, or to enforce our Terms of Use.

Business Transfers: In the event of a merger, acquisition, or sale of all or a portion of our assets, your personal information may be among the transferred assets. We will notify you of any such change via email or prominent notice on the Platform.

IV. How We Protect Information

We implement technical and organizational security measures designed to protect your information from unauthorized access, alteration, disclosure, or destruction. These measures include:

- SSL/TLS encryption for data in transit
- Secure storage with access controls and restricted personnel access
- PCI DSS-compliant payment processing (complete card data is not stored on our servers)
- Regular review of our security practices

No method of electronic transmission or storage is 100% secure. By using the Platform, you acknowledge and accept these inherent risks.

V. Your Rights Regarding Personal Information

You have the following rights with respect to your personal information:

- **Access:** You may request access to the personal information we hold about you.
- **Correction:** You may update or correct your information through your account settings or by contacting us.
- **Deletion:** You may request deletion of your account and personal information. Note that certain information may be retained as required for legal, accounting, or legitimate business purposes (such as transaction records and reward payout records).
- **Marketing Opt-Out:** You may opt out of promotional communications at any time by following the unsubscribe link in any marketing email or updating your notification preferences in your account settings. We may continue to send you administrative and transactional communications.
- **Data Inquiries:** You may request information about how your personal information is processed.

To exercise any of these rights, contact us at privacy@whaleden.com. We will respond in accordance with applicable law.

If you are located in a jurisdiction with applicable data protection laws (including the European Economic Area and the United Kingdom), you may have additional rights and remedies under those laws. For inquiries related to data protection, you may contact us at privacy@whaleden.com.

VI. Data Retention

We retain your personal information for as long as necessary to provide our services and fulfill the purposes described in this Policy:

- Account information is retained while your account is active and for a reasonable period following account closure
- Transaction records and reward payout records are retained for accounting, tax, and legal compliance purposes, typically for a minimum of seven (7) years
- Support and communication records are retained as needed for customer service and legal purposes
- Marketing information is retained until you opt out or we determine it is no longer needed

VII. Third-Party Services

The Platform integrates with third-party services to support its operation, including payment processors, payout and withdrawal service providers, analytics tools, email service providers, and cloud infrastructure providers. These services may independently collect information about your use of their services. We encourage you to review the privacy policies of any third-party services you interact with through the Platform.

VIII. International Data Transfers

Whaleden, Inc. is a U.S.-based company. If you access the Platform from outside the United States, your information may be transferred to, stored, and processed in the United States. By using the Platform, you consent to such transfers in accordance with this Policy.

IX. Links to Other Websites

The Platform may contain links to third-party websites. We are not responsible for the privacy practices or content of those sites. This Policy applies solely to information collected by us through the Platform. We encourage users to review the privacy policies of external sites before providing any personal information.

X. Changes to This Privacy Policy

We may update this Policy over time. Material changes that reduce your rights or expand our collection or use of personal information will be announced at least thirty (30) days in advance by:

- Sending a notice to the primary email address associated with your account
- Placing a prominent notice on the Platform

Non-material changes, clarifications, or updates that do not adversely affect your rights may take effect immediately. We encourage you to review this Policy periodically.

XI. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us:

Whaleden, Inc.

1111B S Governors Avenue, STE 21470

Dover, DE 19904

United States

Privacy inquiries: privacy@whaleden.com

Platform: collect.whaleden.com

This Privacy Policy is effective as of the date last updated above.