Privacy Policy — United States (including California) — Academy of Financial Independence

Effective Date: September 8, 2025   **Last Updated:** September 8, 2025

Your privacy is important to us. It is Academy of Financial Independence's policy to respect your privacy and comply with applicable U.S. laws and regulations regarding personal information we collect across our websites, pages, and applications that we own and operate (the "Services"). Our company is registered in California and we serve users throughout the United States.

"Personal information" means information that identifies, relates to, describes, or could reasonably be linked with you or your household. This may include your name and contact details, transaction and account information, and technical data about how you interact with our Services.

If our Services contain links to third-party websites or services, please note that those have their own privacy policies. After following a link to any third-party content, you should read their posted privacy policy to understand how they collect and use personal information. This Privacy Policy does not apply to your activities after you leave our Services.

1. Scope and Consent

This Privacy Policy applies to the Personal Information we collect through the Services in connection with our online programs and digital educational products, including course delivery via AXL. By using the Services, you agree to this Privacy Policy.

2. Notice at Collection: Categories, Purposes, and Retention

Categories of Personal Information we collect

- **Identifiers:** first and last name.
- **Contact details:** email address and phone number.
- **Payment and transaction data:** amount, currency, payment method, and transaction status. **Billing address** is collected by Stripe. Card data is processed by payment providers; we do **not** store full card numbers.
- **Account and learning data:** user ID, purchased products/courses, learning progress, access events.
- **Technical and analytics data:** IP address, device/browser identifiers, cookies/pixels, and event logs related to your use of the Services.

Purposes of use

- To enter into and perform contracts, process payments, and provide access to products.
- To provide customer support and communicate about orders and services.
- To manage accounts, authenticate access, operate, maintain, and improve the Services, and prevent fraud.

- For analytics and—where permitted by law and your settings—marketing communications.
- To comply with legal, accounting, and tax obligations.

Typical retention periods

- Account, profile, and learning history: while the account is active + **3 years**.
- Transactions and accounting records: **7 years**.
- Support inquiries and requests: **3 years**.
- Marketing contacts: **24 months** from last interaction or until you unsubscribe.
- Technical logs: **12–24 months**.
  Our service providers (e.g., payment processors or hosting platforms) may retain data longer as required by their legal obligations.

3. Sources of Personal Information

We collect Personal Information (a) directly from you (order forms, support requests), (b) automatically through cookies and logs when you use the Services, and (c) from our service providers, including Stripe (and Klarna/Affirm via Stripe), PayPal, Venmo, Zelle, and AXL.

4. Disclosure to Service Providers and Contractors

We disclose Personal Information to service providers and contractors under contract and only for the purposes described in this Policy:

- **Payments and transaction processing:** Stripe (including Klarna and Affirm integrations), PayPal, Venmo, Zelle (as a transfer method).
- **Course platform and content delivery:** AXL.
- **Communications, hosting, and analytics:** your selected providers where applicable.
  We prohibit our providers from using Personal Information for purposes other than those specified in our contracts.

5. Sale/Share of Personal Information

We **do not sell** or **share** Personal Information as those terms are defined under the California Privacy Rights Act (CPRA) for cross-context behavioral advertising. If our practices change in the future, we will update this Policy and provide appropriate opt-out mechanisms.

6. Your Privacy Rights

Depending on your state of residence and applicable law (including CPRA for California residents), you may have the right to:

- request access to and a copy of your Personal Information;
- request correction of inaccurate Personal Information;
- request deletion of your Personal Information (subject to legal exceptions);
- request data portability;
- opt out of the sale or sharing of Personal Information (if such practices apply in the future);
- not be discriminated against for exercising your privacy rights.

To submit a request, contact us at **info@kristinashadrina.com**. We may need to verify your identity before fulfilling your request and will respond within the timelines required by law.

7. International Data Transfers

If Personal Information is transferred outside the United States, we use appropriate legal mechanisms permitted by applicable law and ensure a comparable level of protection in the receiving jurisdiction.

8. Changes to This Policy

We may update this Privacy Policy from time to time and will indicate the "Last Updated" date above. Material changes will be communicated via the Services and/or by email where appropriate.

9. Contact Us

If you have questions about this Privacy Policy or our privacy practices, contact us at **info@kristinashadrina.com**.