# Privacy Policy — tipsterhub.co

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This Privacy Policy explains how **TipsterHub™** ("**tipsterhub.co**", "**we**", "**us**", or "**our**") collects, uses, shares, and protects your information when you use **tipsterhub.co**, our apps, and related services (the "**Services**"). By using the Services, you agree to this Privacy Policy. If you do not agree, please do not use the Services.

### 1) Who we are & how to contact us

Controller: TipsterHub™

Email (privacy): picks@tipsterhub.co

### 2) What we collect (categories of data)

We may collect and process: - Identification & contact data: name, username/handle, email, country, phone. - Account & profile data: avatar, portfolio names/URLs, bios, preferences, roles (subscriber/tipster), referral code/relationships. - Transactional data: purchases, subscriptions, payouts, refunds, coupon use, VAT/tax identifiers where required by law (not full card data—see Processors below). - Usage & device data: IP address, device/browser type, OS, language, time zone, pages viewed, clicks, session duration, approximate location (derived from IP), diagnostic logs. - Communications: support tickets, emails, in-app messages, survey responses. - Content you submit: tips/picks, comments, images, analysis, attachments and metadata. - Cookies & similar tech: identifiers set by us and third parties (see Section 7).

We do **not** intentionally collect sensitive categories of data for the Services.

## 3) Why we use your data (purposes & lawful bases)

We process personal data for the following purposes and—where GDPR applies—on these lawful bases: - **Provide the Services** (create/manage accounts, enable purchases/subscriptions, show content, maintain leaderboards): **contract** necessity. - **Payments & payouts** (billing, fraud prevention, KYC/AML where required): **contract** and **legal obligation**; our **legitimate interests** in ensuring secure transactions. - **Communications** (support, service notices, security alerts): **contract** and **legitimate interests**. - **Marketing** (news, offers, product updates): **consent** where required; otherwise **legitimate interests** with an **opt-out** in every message. - **Analytics & product improvement** (measure traffic, diagnose issues, improve features): **legitimate interests**. - **Security & abuse prevention** (detect spam, enforce policies, protect premium content): **legitimate interests** and **legal obligation**. - **Legal & compliance** (tax/audit, responding to lawful requests, record-keeping): **legal obligation**.

### 4) Sharing your data

We do **not** sell your personal data. We may share it with: - **Service providers/processors** acting on our instructions, such as: - **Cloud hosting & infrastructure:** Amazon Web Services (AWS) - **Payments:** Stripe, Wish, OMT Pay or other payment gateways - **Analytics & diagnostics:** Google Analytics/GA4, error monitoring tools - **Email & messaging:** email delivery and CRM tools - **Identity & verification (if used):** KYC/AML vendors - **Referrals.** If you were referred by another user (e.g., "refer a friend"), your **username** may be visible to the referrer for attribution purposes. - **Professional advisers** (lawyers, accountants) under confidentiality. - **Authorities** when required by law or to protect rights, safety, or the integrity of our Services.

When we share data with processors, we use contracts to require them to protect your data and use it only as instructed.

### 5) How long we keep your data (retention)

We keep personal data only as long as necessary for the purposes described above, including to comply with legal, accounting, or reporting requirements. Typical examples: - **Account data:** retained while your account is active, then deleted or anonymized within a reasonable time after closure, subject to legal holds. - **Transaction records:** retained for **6–10 years** to meet tax/audit duties (jurisdiction-dependent). - **Support communications:** retained for up to **3 years** for quality and dispute handling.

# 6) Cookies & similar technologies

We use cookies and similar technologies to run the Services, remember preferences, secure accounts, and analyze usage.

#### Types:

- Essential cookies (required for login, security, shopping cart/subscriptions).
- **Analytics cookies** (help us understand how the Services are used).
- Marketing cookies (used to measure campaigns and, where applicable, personalize messages).

### 7) Your rights

Depending on your location, you may have the right to: - **Access** the personal data we hold about you. - **Correct** inaccurate or incomplete data. - **Delete** your data (erasure) in certain circumstances. - **Restrict** or **object** to our processing in certain circumstances (including direct marketing at any time). - **Data portability** (receive your data in a common, machine-readable format and/or request we send it to another controller). - **Withdraw consent** where processing is based on consent. - **Complain** to your local data-protection authority.

To exercise rights, contact picks@tipsterhub.co We will respond as required by law. We may request proof of identity to protect your account.

### 8) Children

Our Services are intended for **adults (18+)**. We do not knowingly collect personal data from minors. If you believe a minor has provided personal data, contact us and we will take appropriate steps to remove it.

### 9) Security

We use administrative, technical, and physical measures to protect personal data, including **TLS** in transit and encryption at rest where appropriate, access controls, logging, and regular reviews. However, no system is perfectly secure.

### 10) Communications & preferences

- Service emails (e.g., receipts, security alerts) are necessary and sent even if you
  opt out of marketing.
- Marketing emails: you can unsubscribe at any time using the link in the email or via your dashboard preferences.
- Account deletion: you can request permanent deletion from Account Settings or by emailing picks@tipsterhub.co. Some records (e.g., transaction logs) may be retained as required by law.

## 11) Third-party sites & content

The Services may link to third-party websites/apps we don't control. Their privacy policies govern how they handle your data and cookies. Review those policies before using their services.

### 12) Changes to this Policy

We may update this Privacy Policy from time to time. The "Last updated" date at the top shows when this Policy was last revised. Your continued use of the Services following changes means you accept the updated Policy.