



Adaptive Risk Capital

ARC

Privacy Policy

Last updated: 13 May 2026 · Version: 1.5

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This Privacy Policy explains how Oakmont Marketing & Consultancy handles your personal data when you use the website archybrid.io, the ARC community, the ARC Invest course, 1-on-1 Coaching, and any other educational services offered under the ARC brand.

We keep it short, concrete, and readable. If anything is unclear, email us at info@archybrid.io.

About the ARC brand

ARC is a brand name. The educational services under this name (ARC Invest course and 1-on-1 Coaching) are sold by **Oakmont Marketing & Consultancy**. The ARC Algo is provided under the same brand by **Wealth Wave Affiliation LTD** ("WWA", Czech Republic, CNB license 19819145). This Privacy Policy relates exclusively to the data processing by Oakmont Marketing & Consultancy for the educational services and the archybrid.io website. For data processing related to the algo, WWA is the data controller; please consult WWA's privacy policy.

1. Who is responsible for your data?

Data controller:

Oakmont Marketing & Consultancy IFZA Business Park, DDP, PO Box 342001 Dubai, United Arab Emirates License/registration number: 86831 Email: info@archybrid.io

Important distinction for the ARC Algo: Oakmont Marketing & Consultancy is **not a party** to the ARC Algo and is not a data controller for algo-related data. If you sign up for the algo through our website, you are referred to **Wealth Wave Affiliation LTD** (Czech Republic, CNB license 19819145). You contract directly with WWA. From that moment on, **WWA is the data controller** for your algo account, trading data and broker integration. Please read WWA's own privacy policy for details on how they process your data.

Oakmont Marketing & Consultancy receives only aggregated or hashed data from WWA confirming that you signed up as an affiliate referral — no trading data, no broker credentials, no account balances.

2. What data do we collect?

We only collect data that is necessary to provide and improve our services.

When you visit our website:

- > IP address
- > Browser type and operating system
- > Pages visited and timestamps
- > Referring URL (which site you came from)
- > Click and scroll behaviour (anonymous, via Google Analytics)

When you sign up as a lead (form submission):

- > First name

- > Email address
- > Answer to the capital question (yes/no)
- > Form language (NL or EN)
- > Source/UTM parameters

When you become a course or coaching customer (ARC Invest, 1-on-1 Coaching):

- > Full name
- > Email address
- > Billing address
- > Payment information (processed by Whop / Stripe — we do not see card numbers)
- > Account IDs for Discord and Whop
- > Course progress and activity

When you sign up for the algo (via our referral link):

- > Name + email (via the ARC sign-up form)
- > Affiliate tracking ID (to confirm you came in through us)
- > Confirmation from WWA that you are active (yes/no)

We do **not** receive trading data, broker credentials or account balances from the algo platform.

When you contact us:

- > Email content and attachments you send us
- > Discord messages in community channels
- > Recordings of 1-on-1 calls (only with explicit prior consent)

3. Why do we collect this data?

Purpose	Data	Legal basis (GDPR Article 6)
Performance of the contract (delivering course, coaching)	Name, email, payment data, account IDs	6(1)(b) — contract
Sending welcome emails and service updates	Email, name, capital answer	6(1)(b) — contract / 6(1)(f) — legitimate interest
Marketing emails (newsletter, educational content)	Email, name, behavioural data	6(1)(a) — consent
Website analytics and conversion optimisation	IP, browser, click behaviour	6(1)(a) — consent (cookie banner)
Retargeting via Meta Pixel and Google Ads	Hashed email + IP	6(1)(a) — consent
Affiliate tracking for algo sign-ups (referral to WWA)	Name, email, tracking ID	6(1)(f) — legitimate interest
Fraud prevention and platform security	IP, account activity, device info	6(1)(f) — legitimate interest

Purpose	Data	Legal basis (GDPR Article 6)
Legal retention (invoices, bookkeeping)	Billing data, payment records	6(1)(c) — legal obligation

4. Who do we share your data with?

We never sell your data. We only share it with service providers who help us deliver our services, and only insofar as strictly necessary.

Our processors:

Party	Purpose	Location
GetResponse S.A.	Email marketing, welcome flows, transactional emails, segmentation and engagement tracking	Poland (EU/EEA)
Whop Inc.	Checkout, subscription management for course/coaching, community access	United States
Stripe Inc.	Payment processing	United States / Ireland
Google LLC (Google Analytics 4, Google Ads)	Website analytics and ad attribution	United States (DPF certified)
Google LLC (Google Tag Manager)	Tracking script management	United States
Meta Platforms (Facebook/Instagram Pixel)	Ad attribution and retargeting	United States (DPF certified)
Discord Inc.	Community access and messaging	United States
Netlify Inc.	Website hosting	United States
Google Workspace / Google Sheets	Lead storage and operational documents	United States (DPF certified)

Affiliate partner (not a processor of ARC):

Party	Relationship	Location
Wealth Wave Affiliation LTD	Algo strategy provider (CNB 19819145). You contract directly with WWA. WWA is the data controller for the algo.	Czech Republic

Data Processing Agreement (DPA) with WWA:

For the limited data exchange between Oakmont Marketing & Consultancy and WWA in the context of affiliate tracking (your name, email and tracking ID are passed by ARC to WWA; WWA confirms your

status back to ARC), a Data Processing Agreement is in place pursuant to GDPR art. 28. This DPA covers among other things:

- > the categories of shared data and processing purposes;
- > retention periods per data category;
- > sub-processor authorisations;
- > security requirements pursuant to GDPR art. 32;
- > mutual breach-notification obligation within 24 hours of discovery.

For your algo account, trading data and broker integration, **WWA itself is the data controller**, not Oakmont. A copy of the DPA is available on request via info@archybrid.io.

Specific notice on GetResponse (email platform):

We use GetResponse S.A. (registered office at Grunwaldzka 413, 80-309 Gdańsk, Poland — registered with the Polish National Court Register under KRS 0000942075) as our email service provider. GetResponse acts as a processor on behalf of Oakmont Marketing & Consultancy and is contractually bound by a Data Processing Agreement (DPA) pursuant to GDPR art. 28.

Because GetResponse is established within the European Economic Area, **no transfer to a third country** is required for this processing and additional safeguards (DPF / SCCs) are not required for the email data.

Data category in GetResponse	Examples
Identifying data	First name, email address
Custom fields	Capital question answer (<code>capital_answer</code>), language, source/UTM
Tags	<code>ja_nl</code> , <code>nee_nl</code> , <code>yes_en</code> , <code>no_en</code> (trigger Marketing Automation workflows)
Engagement events	Email opened, link clicked, form submitted, bounce, unsubscribe
Segmentation data	Membership of segments (e.g. ARC Leads — Yes, ARC Algo Customers, ARC Invest Customers)

Lead data is sent to GetResponse via a server-side proxy (Google Apps Script): the website submits the form to the proxy, which in turn creates the contact and corresponding tag in GetResponse. **No GetResponse tracking cookies or scripts** are loaded in your browser.

GetResponse processes this data exclusively to deliver our welcome flows, newsletters and transactional emails, and to measure which messages are effective. GetResponse does not sell your data and does not use it for its own marketing.

Opt-out: every marketing email contains an unsubscribe link. One click removes you from all marketing flows. We then move your email address to a suppression list so you cannot accidentally be re-enrolled. For full deletion from GetResponse, email info@archybrid.io.

Transfers to third countries: Several of our other processors (Whop, Stripe, Google, Meta, Discord, Netlify) are based in the United States. For these transfers we rely on the **EU-US Data Privacy**

Framework (where the party is certified) or on **Standard Contractual Clauses (SCCs)** from the European Commission as an additional safeguard. Our email processing via GetResponse takes place entirely within the EU/EEA.

Government and regulators: We only disclose data to government authorities when legally required.

5. How long do we keep your data?

Type of data	Retention period
Lead data (never became a customer)	24 months after last interaction
Customer data during active course/coaching	Duration of subscription + 12 months
Invoice data	7 years (Dutch tax retention obligation)
Email marketing data (GetResponse: contacts, custom fields, tags, engagement events, segmentation)	24 months after last interaction or unsubscribe; deleted or anonymised thereafter. Suppression list (hashed email only) retained indefinitely to prevent accidental re-enrolment.
Website analytics (Google Analytics)	14 months
Retargeting data (Meta, Google Ads)	Maximum 180 days
Affiliate tracking (algo referral)	24 months
Community messages (Discord)	Duration of membership
1-on-1 call recordings	12 months, automatically deleted thereafter

After the retention period, data is deleted or irreversibly anonymised.

6. Your rights under the GDPR

You have the following rights regarding your personal data:

- > **Access** — request which data we hold about you
- > **Rectification** — have incorrect data corrected
- > **Erasure** — request deletion (“right to be forgotten”)
- > **Restriction** — request temporary suspension of processing
- > **Portability** — receive your data in a structured format
- > **Objection** — object to processing based on legitimate interest or direct marketing
- > **Withdraw consent** — withdraw previously given consent for future processing
- > **Lodge a complaint** — with the competent supervisory authority (Netherlands: Autoriteit Persoonsgegevens, www.autoriteitpersoonsgegevens.nl)

To exercise a right, email info@archybrid.io with the subject line “GDPR request” and specify which right you invoke. We respond within 30 days. For verification we may ask for identification (you may redact

your BSN and passport photo).

Note: for algo-related rights (trading data, account info, broker connection) you must contact WWA directly, as Oakmont Marketing & Consultancy does not hold that data and is not a data controller for the algo.

7. Cookies and tracking technologies

We use cookies and similar technologies to make the website work, analyse usage, and serve ads. You can manage your preferences via our cookie banner or through your browser settings.

For details, see our [Cookie Policy](#).

8. Security and breach notification procedure

8.1 Technical and organisational measures. We implement appropriate measures to protect your data:

- > TLS encryption (HTTPS) across the entire website
- > Encryption of payment data via PCI-DSS certified partners
- > Two-factor authentication on internal accounts
- > Role-based access control within the team
- > Regular backups and audit logging
- > Limited access to customer data on a "need-to-know" basis

8.2 Breach notification procedure (GDPR arts. 33 + 34). Upon discovery of a (possible) data breach, the following internal escalation applies:

Timeframe	Action
Within 24 hours of detection	Breach confirmed and recorded in incident log; impact assessment started
Within 48 hours of detection	Risk analysis completed; determination whether notification to supervisory authority is required (GDPR art. 33) and whether affected individuals must be informed (GDPR art. 34)
Within 72 hours of detection	If notifiable: notification to competent supervisory authority (Dutch Autoriteit Persoonsgegevens or the relevant EU authority based on customer's country of residence)
Without undue delay	If high risk to data subjects: direct personal notification to affected customers

8.3 Default policy for EU customers. For customers domiciled in an EU Member State, notification to the supervisory authority and affected individuals takes place **by default**, unless the breach is demonstrably limited to anonymised data or poses no real risk.

8.4 Contact point. For breach reports or questions: privacy@archybrid.io or info@archybrid.io.

9. Children

Our services are not intended for persons under 18 years of age. We do not knowingly collect data from minors. If you are a parent or guardian and become aware that we have inadvertently collected data from a minor, please email us and we will delete it immediately.

10. Changes

We may update this Privacy Policy from time to time. The most recent version is always available at archybrid.io/privacy. For substantive changes, we will email existing customers.

11. Contact and privacy coordinator

General contact: info@archybrid.io **Specifically for privacy matters, GDPR requests and breach reports:** privacy@archybrid.io

Oakmont Marketing & Consultancy is not required under GDPR art. 37 to appoint a formal Data Protection Officer (DPO). We have however designated an internal privacy coordinator who handles and escalates all privacy matters. For questions about this role or to request an independent contact: privacy@archybrid.io.

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