

# Privacy Policy

Effective Date: September 2, 2026

This Privacy Policy explains how CipherTrades L.L.C. d/b/a MtnSkyAlgo ("MtnSkyAlgo," "Company," "we," "us," or "our") collects, uses, discloses, retains, and protects personal information. It also explains available privacy choices and rights. This Policy should be read with the Terms of Service.

## 1. Scope

This Policy applies to information the Company controls through <https://mtnskyalgo.com>, <https://ciphertrades.com>, their pages, forms, portals, subdomains, redirects, embedded media, downloads, and successor sites; free and premium Discord communities; transactions and access administration through Whop or another Sales Channel; TradingView access; Company-operated or Company-controlled social-media profiles, pages, livestreams, broadcasts, recordings, clips, posts, comments, messages, promotions, and interactions; courses, software, support, testimonials, MSA Rewards, support-analytics tools, and related Services.

Discord, Whop, TradingView, payment partners, social networks, brokers, exchanges, embedded services, and other third parties may separately collect and control information under their own notices. This Policy does not govern a third party's independent processing.

## 2. Categories of Personal Information We Collect

### 2.1 Information You Provide

- Identity and contact information, including name, email address, billing contact information, country or region, display name, username, avatar, and identifiers you choose to provide.
- Account and access information, including Discord user and server identifiers, Whop customer and order identifiers, TradingView username, roles, subscription tier, entitlement, verification details, and account status.
- Communications and User Content, including emails, support requests, survey responses, submitted files, feedback, reviews, testimonial permissions, reports, appeals, and Discord messages, commands, replies, reactions, or channel content available to authorized personnel or tools.
- Request and dispute information, including refund details, cancellation requests, billing issues, order information, fraud reports, privacy requests, legal notices, and supporting records.
- Information submitted through Website forms, event chats, comments, uploads, promotions, redemption workflows, or other interactive features.
- Social-media and public-interaction information made available to the Company, including platform username or identifier, display name, profile image, public profile information, follows, subscriptions, reactions, comments, chat messages, direct messages sent to Company accounts, mentions, tags, shares, moderation records, and content you submit or make public through a platform.

### 2.2 Transaction and Subscription Information

Whop and its financial partners or another disclosed checkout provider collect and process payment credentials. The Company may receive purchaser name, email, order or receipt identifier, product, amount, currency, discount, tax, purchase, renewal, cancellation, access, refund, dispute, country or region, limited fraud indicators, and payment status. The Company generally does not receive or store full payment-card numbers.

## 2.3 MSA Rewards Information

MSA Rewards may process Discord user identifiers, username and display name, avatar, point balance, lifetime points, check-in times, streak and grace status, rank or leaderboard position, transfer activity, redemptions, store items, point price, direct-message preference, administrative adjustments, eligibility, settings, audit events, and backups. Profiles, balances, ranks, streaks, leaderboard entries, and recent redemptions may be visible to other server members through program features.

## 2.4 Website, Device, Cookie, and Log Information

The Websites and providers may automatically collect IP address, approximate location derived from IP, browser, device, operating system, language, referring page, campaign information, pages viewed, links or buttons used, session timestamps, cookie or similar identifiers, access logs, errors, crash data, security events, form events, and performance information.

The Websites, Whop pages, checkout flows, embedded services, and providers may use cookies, local storage, pixels, tags, software development kits, server-side event or conversion APIs, and similar technologies for security, sessions, preferences, checkout, fraud prevention, operation, analytics, attribution, advertising, and measurement. Some technologies may function through a provider platform or server environment rather than solely through a browser cookie. The availability and effect of consent tools, browser settings, platform controls, and provider controls may vary, and blocking technologies may impair functionality.

## 2.5 Giveaway and Prize Information

When you enter or win a Giveaway, the Company or GiveawayBot may process your Discord user identifier, username, server membership, entry interaction, entry and selection timestamps, giveaway message identifier, prize, potential-winner status, and related bot records. If selected, the Company may request reasonably necessary age, legal-majority, U.S. residency, identity, eligibility, contact, tax, and prize-fulfillment information. The Company may announce a winner's Discord display name or handle in the server unless law requires another approach.

GiveawayBot is an independent Discord application and may separately receive and process server, channel, message, user, entry, and winner information under its own terms and privacy practices. The Company does not control GiveawayBot's independent retention, security, or processing. Do not enter if you do not want the entry interaction and potential winner announcement processed through Discord and GiveawayBot.

## 2.6 MSA PropBot Information

PropBot processes third-party promotion and firm information, source evidence, collection and verification timestamps, database records, Discord guild and channel identifiers, administrator-role settings, publication message identifiers, schedules, limited administrator identifiers used for refresh controls, command and error timestamps, and operational logs. Ordinary member commands read saved promotion data and are not intended to create a trading profile or collect a member's prop-firm activity.

PropBot does not require or request brokerage credentials, prop-firm credentials, payment-card information, checkout credentials, trading positions, evaluation results, payout information, or private trading-account data. Users must not submit that information through PropBot or a public Discord channel.

## 2.7 MSA NewsBot Information

NewsBot may process and store economic-event names, agencies, categories, scheduled and publication times, reporting periods, official URLs, source identifiers, impact classifications and reasons, administrator overrides, reported and previous values, status information, retrieval and verification timestamps, source-run status and error summaries, change fingerprints, and related database records. It may also process Discord guild and channel identifiers, administrator-role settings, schedules, publication message identifiers, alert records, command context, and operational and security logs needed to configure, publish, secure, troubleshoot, and audit the service.

Discord supplies interaction, guild, channel, and limited member context when a person uses a NewsBot command. NewsBot uses that context to authorize and respond to the command and is not designed to collect brokerage credentials, brokerage positions, payment-card information, private trading-account data, or a User's complete trading history. Users must not submit sensitive credentials or nonpublic trading information through NewsBot or a public Discord channel.

## 2.8 Futures Planning Utility Information

The Futures Planning Utility is calculated locally in the User's browser. Calculator inputs, arithmetic outputs, custom instrument presets, acknowledgment status, and tutorial preference are not transmitted to the Company by the utility itself. The utility uses session storage and local browser storage, when available, to remember the current-session acknowledgment, tutorial preference, and custom instrument presets.

The utility does not require an account, brokerage connection, price feed, remote calculation service, or Company tracking layer. A User's browser, device, network provider, and the third-party service that hosts or delivers the static files may independently process ordinary request, connection, security, or diagnostic information under their own practices. Clearing browser storage may remove locally saved preferences and custom presets.

## 2.9 Sources

We collect information directly from you; automatically from your device and use; from Discord, Whop, TradingView, payment and checkout partners, social networks, livestream and media platforms, hosting and security providers, referral sources, and other platforms you connect or use; from authorized staff and contractors; and from lawful public or fraud-prevention sources.

## 3. Discord Support Analytics

If enabled, an authorized Company bot or tool may process message content and limited metadata available to the Company through Company-operated Discord areas and applicable platform permissions. Purposes may include identifying recurring questions, onboarding or setup friction, technical issues, documentation gaps, feature requests, product misunderstandings, moderation or safety concerns, and aggregate support trends.

- The Company may limit processing by channel, field, person, provider, purpose, or time based on operational, security, privacy, or platform considerations.
- Direct messages, staff-only channels, voice content, payment credentials, brokerage credentials, government identifiers, seed phrases, private keys, health information, and detailed personal financial records are outside the intended analytics scope unless separately and lawfully requested for a specific support, safety, or legal matter.
- The Company does not authorize Discord API data to be sold, used for third-party advertising profiles, or used to train a general-purpose artificial-intelligence or large-language model except where expressly permitted by Discord and applicable law.
- The Company may aggregate, de-identify, retain, restrict, or delete content according to its operational, security, fraud, moderation, legal, and platform needs, subject to nonwaivable law.

## 4. Purposes for Using Information

- Provide, authenticate, deliver, personalize, maintain, and support the Services and access entitlements.
- Process purchases, Subscriptions, renewals, cancellations, refunds, disputes, taxes, discounts, fulfillment, and related records.
- Operate Discord communities, TradingView access, MSA Rewards, livestreams, courses, support systems, Websites, forms, and software.

- Publish, administer, moderate, secure, analyze, and respond to Company social-media pages, public livestreams, chats, comments, messages, clips, posts, and other public-facing content or interactions.
- Communicate about orders, access, billing, security, support, moderation, document changes, and other transactional matters.
- Detect, prevent, investigate, and respond to fraud, impersonation, abuse, unauthorized access, malicious activity, payment disputes, policy violations, and security incidents.
- Analyze aggregate use and support themes, diagnose problems, improve onboarding, documentation, products, content, and service quality, and measure communications.
- Administer testimonials, reviews, promotions, surveys, and marketing where permission or another lawful basis exists.
- Comply with law and platform obligations; enforce agreements; protect rights, property, safety, and service integrity; and establish, exercise, or defend legal claims.

Depending on the location and context, processing may rely on performance of a contract, steps requested before a contract, consent, compliance with legal obligations, and legitimate interests in operating, securing, supporting, enforcing, and improving the Services. Consent may be withdrawn prospectively where consent is the applicable basis.

We use Giveaway information to administer entries, conduct random drawings, verify eligibility, contact and announce potential winners, fulfill prizes, prevent duplicate or abusive entries, maintain promotion records, address disputes, and comply with tax, sanctions, and other legal obligations.

We use PropBot information to collect, normalize, verify, store, publish, and audit promotion records; answer Discord commands; configure channels and schedules; prevent duplicate publication or abusive refreshes; maintain security and reliability; troubleshoot errors; and preserve evidence of what information was checked or displayed at a particular time.

We use NewsBot information to collect, normalize, classify, store, update, publish, and audit economic-event records; provide scheduled calendars, alerts, and command responses; apply administrator corrections; prevent duplicate publications; monitor source and service health; maintain security and reliability; troubleshoot errors; and preserve evidence of what was obtained or displayed at a particular time.

## 5. How We Disclose Information

- Service providers and processors that support hosting, databases, storage, communications, customer support, analytics performed for us, document management, security, fraud prevention, access fulfillment, backups, and technical operations, subject to appropriate purpose and confidentiality restrictions.
- Whop, payment and financial partners, tax providers, and checkout providers for orders, billing, fraud screening, access, cancellations, refunds, disputes, and transaction-tax functions.
- Discord, TradingView, social networks, livestream and media platforms, embedded services, and other platforms as needed to publish or administer content, provide a requested feature, fulfill access, moderate interactions, investigate misuse, or follow your direction.
- Professional advisers, auditors, insurers, regulators, law enforcement, courts, or other parties where reasonably necessary to comply with law or lawful process, protect rights or safety, investigate fraud or abuse, collect amounts owed, enforce agreements, or establish or defend claims.
- A buyer, successor, lender, investor, adviser, or counterparty in connection with a proposed or completed financing, merger, acquisition, reorganization, bankruptcy, sale of assets, or transfer of a Service, subject to appropriate safeguards.
- Other parties at your direction, with your consent, or as otherwise disclosed when information is collected.

The Company does not sell personal information for money and does not authorize Discord API data for data-broker or third-party advertising purposes. The Company may use or enable analytics, attribution, advertising, or conversion-measurement technologies on its Websites, Whop pages, checkout flows, or other Services, including Whop tracking integrations, Meta Business Tools such as the Meta Pixel or Conversions API, and current or future providers. Naming a provider does not mean it is active at all times.

Giveaway and PropBot information may be disclosed to or processed by Discord, GiveawayBot, hosting and database providers, approved promotion-data API providers, professional advisers, tax providers, fraud and security services, and authorities when reasonably necessary for the purposes described in this Policy. Prop firms and code owners independently control information a User submits after following a third-party link.

NewsBot information may be disclosed to or processed by Discord, hosting and database providers, official government sources, approved API and feed providers, security and monitoring providers, professional advisers, and authorities when reasonably necessary for the purposes described in this Policy. Calculator information saved locally remains subject to the User's browser and device controls, while the static hosting provider may independently process routine connection information.

## **6. Cookies, Analytics, and Preference Signals**

Cookie and similar-technology choices may be available through a consent tool and browser or device controls. The Company does not respond to legacy Do Not Track signals that lack a uniform legal standard. Where applicable law requires recognition of an opt-out preference signal, such as a supported Global Privacy Control signal, the Company will process it as required for the relevant browser or device.

Third-party links, embeds, videos, widgets, and checkout pages may set their own technologies and collect information under their policies. Review those notices before interacting. The Company does not control a third party's settings, retention, security, or response to preference signals.

Potential providers may include Whop tracking integrations; Meta Business Tools such as the Meta Pixel or Conversions API; and comparable current or future services from analytics, advertising, attribution, affiliate, social-media, customer-relationship, security, fraud-prevention, hosting, or performance providers. Whop integrations may connect with providers such as Google Analytics, Hyros, Meta, TikTok, X, Reddit, Pinterest, or HubSpot. These examples are not exhaustive, and naming a provider does not mean the integration is currently enabled or used for every User.

Whop, Meta, and other providers control and manage their own systems and may process information directly from a browser, device, Whop, Meta, another platform, or a Company server. Providers may determine their independent collection, identifiers, inferences, combinations, storage, retention, security, disclosures, controls, and later use under their own terms and notices. The Company may receive only selected dashboards, reports, measurements, or event results and may not receive, possess, know, or control all underlying or raw information.

Depending on the provider, platform, and configuration, information collected, inferred, associated, or received may include IP address and approximate location; browser, device, operating-system, language, and screen information; referring and destination URLs; timestamps; cookie, device, session, advertising, campaign, affiliate, click, or similar identifiers; pages or content viewed; links, buttons, forms, and features used; advertisement and campaign interactions; security, error, performance, or fraud signals; and events such as a visit, registration, checkout, purchase, subscription, renewal, cancellation, refund, or other conversion. This description is illustrative, not a promise, inventory, or limit on what an independent provider may collect, infer, associate, retain, or make available through its systems.

For technologies deployed through a Website configuration controlled by the Company, legally required notice, consent, rejection, withdrawal, or opt-out mechanisms apply only to the extent required by law and within the Company's technical control. Choices made through a Company Website may not control Whop, Meta, social-media, or other independent third-party properties, accounts, systems, or prior processing. Users should review and use each provider's own notices and controls. The Company does not control or warrant an

independent provider's collection, retention, deletion, aggregation, de-identification, security, disclosure, response to choices, or later use.

## **7. Retention, De-identification, and Deletion**

We retain personal information only as long as reasonably necessary for the purposes described, including the access term; account, entitlement, support, and rewards administration; transaction, tax, accounting, and audit records; security, fraud, moderation, and incident response; contract and assent evidence; dispute and limitation periods; legal holds; and compliance obligations.

Retention varies by information, system, purpose, and context. The Company may delete, aggregate, or de-identify Discord support-analytics content when it is no longer reasonably useful for an authorized purpose. A bot shutdown or deletion request does not require deletion of security logs, transaction records, fraud evidence, legal holds, claim records, de-identified information, or backups except to the extent applicable law requires otherwise.

Where applicable law imposes requirements on de-identified information, the Company applies those requirements to the extent they govern the relevant information. Backups may remain isolated from ordinary use until overwritten under the backup cycle unless preservation is legally required.

Giveaway records may be retained for administration, winner verification, tax and accounting, fraud prevention, dispute, limitations, and legal-compliance periods. PropBot promotion evidence, publication records, configuration, timestamps, administrator refresh controls, and logs may be retained as reasonably necessary to operate, secure, audit, and defend the service. The Company may aggregate or de-identify records and may preserve evidence subject to a legal hold.

NewsBot event history, source evidence, classifications, configuration, publication and alert records, timestamps, source-health records, administrator overrides, and logs may be retained as reasonably necessary to operate, secure, audit, improve, and defend the service. Calculator information stored locally remains until the browser, User, or device removes it or storage becomes unavailable; the Company cannot retrieve or delete information that the utility stores only on the User's device.

## **8. Security and Incident Response**

The Company uses administrative, technical, and organizational safeguards appropriate to the information and risk. Measures may include least-privilege and role-based access, authentication, credential and secret management, encryption in transit and at rest where supported, logging, backups, patching, provider review, access revocation, and incident procedures.

No transmission, storage method, platform, or safeguard is guaranteed secure. You are responsible for protecting your accounts and for not submitting information that is unnecessary or unsafe. Do not send payment-card numbers, brokerage credentials, authentication codes, government identifiers, health information, seed phrases, private keys, or exact account details through a general Website form or Discord channel.

Suspected incidents may be investigated, contained, remediated, documented, and reported to affected persons, platforms, regulators, law enforcement, or others where required or reasonably necessary. The Terms of Service controls applicable warranty disclaimers and liability limits.

## **9. Privacy Rights and Choices**

Subject to applicable law, scope thresholds, identity verification, and exceptions, you may have rights to request confirmation of processing; access; correction; deletion; a portable copy; a list or categories of recipients; withdrawal of consent; or an opt-out from sale, targeted advertising, or certain profiling if those activities occur. You may also have a right to appeal a denied request or complain to a regulator.

Submit a request to [ciphertrades1@gmail.com](mailto:ciphertrades1@gmail.com) with enough information to identify the account and records. The Company may request proportionate verification, verify an authorized agent's authority, ask for

clarification, and decline or limit a request that cannot be verified, exceeds applicable rights, is manifestly unfounded or excessive, threatens security or another person's rights, or falls within a legal exception. Information may be retained where required for transactions, tax, accounting, fraud prevention, security, legal obligations, disputes, or claims.

To appeal a denied request, email the same address with "Privacy Appeal" in the subject line and identify the challenged decision. The Company will respond within the time required by applicable law and provide any required information about further complaint options.

You may unsubscribe from promotional email using the included method or by contacting the Company. Transactional, security, billing, access, moderation, and legal communications may continue where necessary. You may adjust Discord, Whop, TradingView, browser, device, cookie, and bot direct-message settings through the relevant platform where available.

## **10. International Processing**

The Company is based in Texas, United States. Information may be processed in the United States and other locations where providers operate. Laws in those locations may differ from the laws where you live. Where required, transfers use a recognized legal mechanism and appropriate safeguards. Nonwaivable privacy and data-protection rights remain available.

## **11. Children and Age Restriction**

The Services are intended only for adults age 18 or older and are not directed to children. The Company does not knowingly collect personal information from anyone under 18. If the Company learns that a minor provided personal information, it may terminate access and will delete the information as required, subject to lawful security, fraud, transaction, and legal records. A parent or guardian who believes a minor submitted information should contact [ciphertrades1@gmail.com](mailto:ciphertrades1@gmail.com).

## **12. Changes to This Policy**

The Company may update this Policy prospectively to reflect Services, practices, providers, risks, or law by posting or otherwise making an updated version available. The update is effective on the date stated in it, subject to any additional notice or consent that nonwaivable law requires. The Company may retain prior versions and related records as reasonably necessary.

## **Contact**

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