

# BROOKFIELD MEDIA LLC™

## PRIVACY POLICY

*Last Modified: March 20, 2026*

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### 1. Introduction

Brookfield Media LLC™ (“Company,” “we,” “us,” or “our”) is committed to lawful, fair, and transparent collection and use of your personal information. This Privacy Policy (“Policy”) governs how we collect, use, store, share, and protect information from individuals who access or use our website, digital products, courses, coaching programs, software tools, and any related content or services (collectively, the “Services”), accessible at [www.ralphervin.com](http://www.ralphervin.com) and any associated domains or platforms operated by the Company.

This Policy applies to all users of our Services regardless of where they are located. By accessing or using our Services, you agree to the terms of this Policy. If you do not agree with any part of this Policy, you should not use our Services.

We may update this Policy from time to time to reflect changes in our practices, technology, or applicable law. The “Last Modified” date at the top of this document indicates when the most recent revision was made. Your continued use of our Services after any update constitutes acceptance of the revised Policy. Where changes are material, we will make reasonable efforts to notify you via email or a prominent notice on our website.

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### 2. Information We Collect

We collect information in the following ways:

#### 2.1 Information You Provide Directly

We collect personal information that you voluntarily provide to us when you:

- Register for an account or create a user profile
- Purchase a product, course, program, or subscription
- Submit an inquiry, application, or contact form
- Enroll in a coaching, consulting, or group program
- Subscribe to our email list or newsletter
- Participate in surveys, challenges, contests, or community activities
- Communicate with us by email, phone, or any other channel

This information may include your full name, email address, phone number, billing address, payment information (processed securely by third-party payment processors — we do not store

full payment card details), business name, business goals, and any other information you choose to provide.

## **2.2 Information Collected Automatically**

When you interact with our website or digital platforms, we and our service providers may automatically collect certain technical and usage information, including:

- IP address (which may constitute personal data under applicable privacy laws)
- Browser type, version, and language settings
- Device type, operating system, and unique device identifiers
- Pages visited, time spent on pages, links clicked, and navigation paths
- Referring URLs and exit pages
- Date and time of your visit
- General geographic location (derived from IP address)

This information is collected through cookies, web beacons, pixel tags, and similar tracking technologies, as described in Section 5 of this Policy.

## **2.3 Information from Third Parties**

We may receive information about you from third-party sources, including:

- Payment processors (e.g., Stripe, PayPal) who provide transaction confirmation data
- Social media platforms if you interact with our content or connect a social account
- Analytics and advertising platforms that provide aggregated audience data
- Referral partners or affiliates who direct you to our Services

We use this information to verify transactions, improve our Services, and provide you with a more personalized experience.

## **2.4 Sensitive Personal Information**

We do not intentionally collect sensitive categories of personal information, including health or medical information, genetic data, racial or ethnic origin, religious beliefs, sexual orientation, political opinions, or financial account credentials. Please do not submit this type of information through our Services. If you inadvertently provide such information, we will delete it as soon as reasonably practicable upon becoming aware of it.

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## **3. How We Use Your Information**

We use the information we collect for the following purposes:

- To create, manage, and maintain your account and access to purchased Services
- To process payments and fulfill orders, enrollments, and service agreements
- To deliver course content, coaching sessions, consulting services, and program materials

- To send transactional communications, including purchase confirmations, receipts, access credentials, and service-related notices
- To send marketing and promotional communications about our products, programs, and events, where you have opted in or where permitted by applicable law
- To respond to your inquiries, support requests, and feedback
- To personalize your experience and improve the relevance of our content and recommendations
- To analyze usage patterns and improve the performance, design, and content of our Services
- To enforce our Terms of Service and protect the rights, property, and safety of the Company and others
- To comply with applicable legal obligations, respond to legal process, and cooperate with regulatory authorities
- To detect, investigate, and prevent fraudulent transactions and other prohibited or illegal activity

We will not use your personal information for purposes materially different from those described above without obtaining your prior consent or as otherwise required or permitted by applicable law.

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## 4. Legal Bases for Processing (Applicable to EEA, UK, and Similar Jurisdictions)

If you are located in the European Economic Area (EEA), the United Kingdom, or another jurisdiction that requires a legal basis for processing personal data, we process your personal information under one or more of the following legal bases:

- **Contractual Necessity:** Processing is necessary to perform a contract with you or to take steps at your request prior to entering into a contract (e.g., delivering a purchased course or consulting engagement).
- **Legitimate Interests:** Processing is necessary for our legitimate business interests, provided those interests are not overridden by your rights and interests (e.g., improving our Services, preventing fraud, marketing to existing customers).
- **Consent:** You have given us your explicit consent for a specific processing purpose (e.g., subscribing to our marketing emails). You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- **Legal Obligation:** Processing is necessary for us to comply with a legal or regulatory obligation.
- **Vital Interests:** Processing is necessary to protect the vital interests of you or another natural person.

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## 5. Cookies and Tracking Technologies

## 5.1 What We Use

We use cookies and similar tracking technologies (including web beacons, pixel tags, and session replay tools) to operate and improve our website and Services, and to deliver relevant advertising. These technologies help us understand how visitors use our site, remember your preferences, and measure the effectiveness of our marketing.

## 5.2 Categories of Cookies We Use

- **Strictly Necessary Cookies:** Required for the website to function. They enable core features such as security, account access, and shopping cart functionality. These cannot be disabled without breaking the site.
- **Analytics and Performance Cookies:** Used to collect information about how visitors use our site (e.g., pages visited, time on site, error messages). We use tools such as Google Analytics for this purpose. This data is aggregated and anonymized where possible.
- **Functional Cookies:** Allow us to remember your preferences and settings (e.g., language, region) to provide an enhanced experience.
- **Marketing and Targeting Cookies:** Used to deliver advertising that is relevant to you and your interests. These may include pixels and tracking tags from third-party platforms such as Meta (Facebook), Google Ads, and others. These cookies track your activity across websites to build a profile and show you relevant ads.

## 5.3 Third-Party Tracking

We may use tracking pixels, tags, and similar technologies provided by third-party advertising and analytics platforms including, but not limited to, Meta Pixel (Facebook/Instagram), Google Analytics, Google Tag Manager, and our CRM and marketing automation platform (GoHighLevel / HighLevel). These third parties have their own privacy policies governing their use of information collected through these technologies. We are not responsible for their practices.

## 5.4 Your Cookie Choices

Most web browsers allow you to control cookies through browser settings. You may refuse all non-essential cookies by adjusting your browser settings; however, doing so may limit your ability to use certain features of our website. You may also opt out of interest-based advertising through the Digital Advertising Alliance ([www.aboutads.info](http://www.aboutads.info)), the Network Advertising Initiative ([www.networkadvertising.org](http://www.networkadvertising.org)), or by using platform-specific opt-out controls (e.g., Google Analytics Opt-Out Browser Add-On at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout)). Please note that opting out of cookies does not mean you will no longer see ads; it means the ads you see may be less relevant to you.

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## 6. How We Share Your Information

We do not sell your personal information to third parties. We may disclose your personal information in the following limited circumstances:

### 6.1 Service Providers and Business Partners

We share your information with trusted third-party vendors and service providers who assist us in operating our business and delivering our Services, including:

- Payment processors (e.g., Stripe, PayPal) for billing and transaction processing
- CRM and marketing automation platforms (e.g., GoHighLevel / HighLevel) for contact management, email delivery, and funnel operations
- Email service providers for transactional and marketing communications
- Video hosting and course delivery platforms (e.g., YouTube, Vimeo, or similar)
- Analytics platforms (e.g., Google Analytics, VidIQ) for website and content performance measurement
- Scheduling and calendar tools for booking coaching and consulting sessions
- Cloud storage and infrastructure providers for data storage and security

These service providers are authorized to use your personal information only as necessary to perform services on our behalf and are contractually required to protect your information in a manner consistent with this Policy.

## **6.2 Affiliates and Business Transfers**

We may share your information with our subsidiaries, parent companies, or affiliated entities for purposes consistent with this Policy. In the event of a merger, acquisition, reorganization, dissolution, or sale of all or a portion of our assets, your information may be transferred to the acquiring entity, subject to the same protections described in this Policy.

## **6.3 Legal Requirements and Safety**

We may disclose your personal information when required to do so by law, court order, or governmental or regulatory authority, or where we believe in good faith that disclosure is necessary to: (a) comply with any applicable legal obligation; (b) protect and defend the rights or property of the Company; (c) prevent or investigate possible wrongdoing in connection with the Services; or (d) protect the safety of users of the Services or the public.

## **6.4 With Your Consent**

We may share your information with third parties in ways not described above when we have obtained your explicit consent to do so, such as when you opt in to co-marketing arrangements or third-party offers.

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## **7. International Data Transfers**

Brookfield Media LLC™ is based in the United States. If you are accessing our Services from outside the United States, including from the European Economic Area (EEA), the United Kingdom, or other regions with laws governing data collection and use, please be aware that your information will be transferred to and processed in the United States.

For transfers of personal data from the EEA or the UK to the United States, we rely on legally recognized transfer mechanisms where required under applicable law, including Standard Contractual Clauses (SCCs) approved by the European Commission, or equivalent mechanisms as permitted under the laws of the relevant jurisdiction. By using our Services, you consent to

the transfer of your information to the United States and acknowledge that U.S. data protection laws may differ from those in your country.

We take reasonable steps to ensure that personal data transferred internationally is protected in accordance with this Policy and applicable legal requirements.

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## 8. Data Retention

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, as described in this Policy, and in accordance with our legal and regulatory obligations. The specific retention periods we apply are as follows:

- **Account and Transaction Data:** Retained for the duration of your active account plus seven (7) years following account closure or the last transaction, to comply with applicable tax, accounting, and legal record-keeping requirements.
- **Course and Program Access Records:** Retained for the duration of your enrollment plus five (5) years, to support potential disputes, refund inquiries, or regulatory requests.
- **Marketing and Communications Data:** Retained until you unsubscribe, withdraw consent, or request deletion, whichever occurs first.
- **Support and Correspondence Records:** Retained for three (3) years from the date of the last communication.
- **Automatically Collected Technical Data:** Retained for up to twenty-four (24) months, after which it is anonymized or deleted.

When personal information is no longer needed and no legal retention obligation applies, we will securely delete, destroy, or anonymize it so that it can no longer be associated with you.

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## 9. How We Protect Your Information

We implement commercially reasonable administrative, technical, and physical safeguards designed to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction. These measures include, but are not limited to, encrypted transmission of sensitive data (including payment information) via Secure Socket Layer (SSL) technology, access controls limiting data access to authorized personnel with a legitimate business need, secure hosting environments maintained by our infrastructure providers, and periodic review of our security practices.

However, no method of data transmission or storage over the internet is completely secure. We cannot guarantee the absolute security of your personal information. Any transmission of personal data to our Services is at your own risk. If you have reason to believe that your interaction with us is no longer secure, please contact us immediately at [support@ralphervin.com](mailto:support@ralphervin.com).

In the event of a data breach that affects your personal information, we will notify you and the appropriate regulatory authorities as required by applicable law.

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## 10. Your Privacy Rights

Depending on your location and applicable law, you may have some or all of the following rights with respect to your personal information:

### 10.1 Rights Available to All Users

- **Right to Access:** You may request a copy of the personal information we hold about you.
- **Right to Correction:** You may request that we correct inaccurate or incomplete personal information.
- **Right to Deletion:** You may request that we delete your personal information, subject to certain legal exceptions (e.g., where retention is required by law or necessary to fulfill a contract).
- **Right to Opt Out of Marketing:** You may opt out of receiving marketing communications from us at any time by clicking the “Unsubscribe” link in any marketing email, or by contacting us at [support@ralphervin.com](mailto:support@ralphervin.com). Please note that opting out of marketing emails does not opt you out of transactional or service-related communications.

### 10.2 Additional Rights for EEA and UK Residents (GDPR)

If you are located in the EEA or the UK, you have the following additional rights under the General Data Protection Regulation (GDPR) or UK GDPR:

- **Right to Restriction of Processing (Article 18):** You may request that we restrict the processing of your personal data in certain circumstances, such as while we verify the accuracy of data you have contested.
- **Right to Data Portability (Article 20):** You have the right to receive personal data you have provided to us in a structured, commonly used, machine-readable format, and to transmit that data to another controller, where technically feasible.
- **Right to Object (Article 21):** You have the right to object to our processing of your personal data where it is based on legitimate interests or used for direct marketing purposes. We will cease such processing unless we can demonstrate compelling legitimate grounds that override your interests, or the processing is necessary for legal claims.
- **Right Not to Be Subject to Automated Decision-Making (Article 22):** You have the right not to be subject to decisions based solely on automated processing that produce legal or similarly significant effects, unless such processing is necessary for a contract, authorized by law, or based on your explicit consent.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with a supervisory authority in your country of residence if you believe we have processed your personal data unlawfully.

### 10.3 Rights for California Residents (CCPA / CPRA)

If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA):

- **Right to Know:** You have the right to request disclosure of the categories and specific pieces of personal information we have collected about you, the categories of sources, the business or commercial purpose for collection, and the categories of third parties with whom we share it.
- **Right to Delete:** You have the right to request deletion of personal information we have collected from you, subject to certain exceptions.
- **Right to Correct:** You have the right to request correction of inaccurate personal information.
- **Right to Opt Out of Sale or Sharing:** We do not sell personal information. However, our use of certain advertising cookies and pixels may constitute “sharing” personal information for cross-context behavioral advertising under CPRA. You may opt out of such sharing by adjusting your cookie preferences or by contacting us.
- **Right to Limit Use of Sensitive Personal Information:** To the extent we collect sensitive personal information (as defined by CPRA), you have the right to limit our use and disclosure to purposes permitted by law.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA/CPRA rights. We will not deny you goods or services, charge you different prices, or provide a different level of quality because you exercised your privacy rights.

To exercise your California privacy rights, please contact us at [support@ralphervin.com](mailto:support@ralphervin.com) with the subject line “California Privacy Request.” We will respond to verified requests within the timeframes required by applicable law.

#### **10.4 How to Submit a Privacy Request**

To exercise any of the rights described in this Section, please contact us at [support@ralphervin.com](mailto:support@ralphervin.com) with the subject line “Privacy Rights Request.” Please include your full name, email address, and a description of the right you wish to exercise. We may need to verify your identity before processing your request. We will respond within the timeframe required by applicable law (generally 30 days, with extensions where permitted).

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## **11. Children’s Privacy**

Our Services are not directed to, and are not intended for use by, individuals under the age of 18. We do not knowingly collect personal information from anyone under the age of 18. If you are a parent or guardian and believe that your child has provided us with personal information without your consent, please contact us immediately at [support@ralphervin.com](mailto:support@ralphervin.com). If we learn that we have collected personal information from a minor, we will take prompt steps to delete that information from our records.

In jurisdictions where the age of digital consent differs from 18 (such as certain EU member states under GDPR), we apply the stricter applicable standard.

## 12. Third-Party Websites and Services

Our Services may contain links to third-party websites, platforms, or services that are not owned or controlled by Brookfield Media LLC™. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services. This Policy does not apply to any third-party site or service you access through a link on our website. We strongly encourage you to review the privacy policies of any third-party sites you visit.

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## 13. Email Communications and Marketing Opt-Out

By providing your email address to us, you agree to receive transactional communications related to your account, purchases, and Services. If you have opted in to our marketing communications, you will also receive promotional emails about our products, programs, events, and content.

You may opt out of marketing emails at any time by:

- Clicking the “Unsubscribe” link at the bottom of any marketing email we send
- Contacting us directly at support@ralphervin.com with the subject line “Unsubscribe”

Please allow up to 10 business days for your opt-out request to take effect. Please note that even after opting out of marketing communications, you may continue to receive transactional and service-related emails (such as purchase confirmations, access credentials, and policy updates) that are necessary for the administration of your account. These are not marketing communications and cannot be opted out of while your account remains active.

We comply with the CAN-SPAM Act and all other applicable anti-spam laws. Every marketing email we send will include our physical mailing address and a clear, functional opt-out mechanism.

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## 14. Do Not Track Signals

Some web browsers transmit “Do Not Track” (DNT) signals to websites. Currently, there is no universally accepted standard for how websites should respond to DNT signals. Our website does not currently alter its data collection or use practices in response to DNT signals. We will continue to monitor developments in this area and update our practices if and when a recognized standard is established.

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## 15. Changes to This Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time in our sole discretion. The “Last Modified” date at the top of this Policy reflects the date of the most recent revision.

We will notify you of material changes by posting a prominent notice on our website, by sending an email to the address associated with your account, or by other means as required by applicable law. Your continued use of our Services after any changes are posted constitutes your acceptance of the revised Policy.

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## **16. Contact Us**

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

**Brookfield Media LLC™**

26 S. White Horse Pike #491

Somerdale, NJ 08083, United States

Email: [support@ralphervin.com](mailto:support@ralphervin.com)

Phone: (213) 340-4049

Website: [www.ralphervin.com](http://www.ralphervin.com)

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