

MMB Financial Coaching — Privacy Policy

Effective Sep 30, 2026 · A division of TPA Holdings LLC

1. Who We Are and What This Policy Covers

MMB Financial Coaching ("MMB," "we," "us," or "our") is a financial education and coaching program operated as a division of TPA Holdings LLC, 30 N Gould St, Ste R, Sheridan, WY 82801. This Privacy Policy explains what personal information we collect, how we use and protect it, who we share it with, and the choices and rights you have.

We built this policy around one principle: the financial details you share with us in coaching are among the most sensitive information you own. We collect only what we need to teach and coach you, we never sell it, and we share it outside MMB only as described below or with your permission.

This Privacy Policy is part of, and should be read together with, the MMB Financial Coaching Terms and Conditions, Cancellation & Refund Policy, Founding Member Pricing Lock-In Policy, and Client Agreement. If this policy conflicts with any of those documents on a question of how personal information is handled, this policy controls.

By using our websites, submitting a form, booking a session, or enrolling in the Program, you acknowledge that you have read this Privacy Policy. If you do not agree with it, please do not use our services.

2. Scope

This policy applies to personal information collected through any of the following (together, the "Services"):

- **Websites:** www.mmbfc.money, www.mmbfinancialcoaching.com, and any page, blog post, or landing page operated by MMB.
- **Member areas:** the client account portal, member log-in, My Subscriptions, Notifications, and Program List pages.
- **Coaching services:** the Single-Session package and the Silver, Elite, Platinum, and Premier memberships, including weekly group coaching, monthly one-on-one coaching (by Zoom or phone), additional paid sessions, and the Premier multigenerational family plan.
- **Program materials:** the MMB workbook, worksheets, budget trackers, weekly homework emails, Deep Homework submissions, and benchmark/gate checkpoints.
- **Forms and agreements:** website contact forms, booking and checkout forms, intake forms, the Payment and Agreement Disclosure, the Communication Consent form, the Client Agreement, testimonial releases, and any survey or feedback form.
- **Communications:** email, text message (SMS/MMS), phone calls, video sessions, and direct messages with MMB.
- **Digital products and publications** sold or distributed by MMB, and events, workshops, webinars, podcasts, and social media pages operated by MMB.

This policy does not cover services provided by affiliated companies under their own separate agreements, such as Accudo Capital Investments or The Pimpleton Agency. Those companies have their own privacy notices, which govern any information you give them directly or that we transfer to them at your request (see Section 7).

3. Information We Collect

We collect the categories below. Most of it comes directly from you; you choose how much financial detail to share in coaching.

Category	Examples	Where it comes from
Identity and contact	Name, email, phone number, mailing address, time zone, preferred contact method	Forms, booking, checkout, account sign-up
Account and log-in	Username, member profile, password (stored in hashed form by our website platform), subscription status, founding-member status and enrollment date	Member portal
Payment and billing	Package purchased, billing cadence, charge and renewal dates, refund and cancellation history, billing address, last four digits and type of card	Checkout and our payment processors
Scheduling and attendance	Sessions booked, attended, missed, rescheduled, group session participation	Booking system, session records
Financial information you share	Income, expenses, budgets, savings and emergency-fund levels, debts and balances, credit reports and scores, retirement and insurance coverage, tax-bucket allocations, business finances, estate-planning status, financial goals	Intake forms, worksheets, workbook, Deep Homework, coaching conversations
Coaching records	Coach notes, homework submissions and written reflections, screenshots you	Coaching sessions and program materials

Category	Examples	Where it comes from
	send, benchmark and gate results, progress trackers	
Household and family	Names, ages, and relationships of spouses, children, parents, or dependents you mention or enroll under a family plan	You, as the enrolling client
Communications	Emails, texts, call records, messages, feedback, survey responses, and your communication consents and opt-outs (with date, time, and method)	You and our communication tools
Device and usage	IP address, browser and device type, pages viewed, referring site, approximate location from IP, cookie identifiers	Automatically, through our website platform (Section 8)
Testimonials	Your story, quotes, results, name, and image, only if you give written permission	Testimonial release

Information we do not want. We do not need, and ask you not to send, your Social Security number, full bank or card account numbers, account passwords, PINs, or security answers. Before you share a statement, credit report, or screenshot, please redact or cover those items. If we receive them anyway, we will delete them from our records as soon as we notice, except where the law requires us to keep them.

Payment cards. Full card numbers are entered directly into our payment processors' secure checkout. MMB does not receive or store your full card number or security code.

4. How We Use Your Information

We use personal information only for the purposes below:

- **Deliver the Program:** enroll you, run group and one-on-one sessions, send weekly homework, review your Deep Homework, track your progress through benchmark gates, and personalize coaching to your situation.
- **Manage your account and billing:** process payments, renewals, upgrades, downgrades, cancellations, and refunds; apply founding-member pricing; and send the renewal reminders and cancellation confirmations required by our policies and by law.
- **Communicate with you:** answer questions, send scheduling reminders and service notices, and, subject to your choices in Section 6, send educational and marketing content.

- **Improve our services:** evaluate and update curriculum, worksheets, and coaching methods. Where we study program results, we use combined or de-identified data that does not identify you.
- **Refer you, only at your request:** connect you with a licensed professional when a question moves beyond education and coaching (see Section 7).
- **Protect you and MMB:** prevent fraud, secure accounts, enforce our Terms and Conditions, resolve disputes, and keep records of consents and agreements.
- **Meet legal obligations:** comply with tax, accounting, consumer protection, and telemarketing laws, and respond to lawful requests from authorities.

We do not use your personal financial information to make credit, lending, insurance, or employment decisions about you, and we do not sell product recommendations based on it.

5. Coaching Confidentiality, Group Sessions, and Recordings

One-on-one coaching. What you share with your coach is treated as confidential. Access is limited to your coach and the MMB staff who need it to deliver your Program, and it is not disclosed outside MMB except as described in Section 7.

Group coaching. In group sessions, anything you say, show, or type in chat can be seen and heard by other participants. Our Terms and Conditions require every participant to keep what others share confidential, but MMB cannot control what other participants do. Please do not share account numbers or details you want kept private in a group setting; save them for your one-on-one call. During live worksheet walkthroughs, you may keep your camera off and your numbers to yourself.

Recordings. MMB does not record one-on-one sessions without your prior consent. If we record a group session, for example to offer a replay to enrolled members, we will tell participants before recording begins, limit access to members of that program, and let you participate with camera and microphone off or leave the session. Participants may not record, screenshot, or redistribute any session.

Coaching is not a privileged relationship. Communications with a coach are not protected by attorney-client, accountant-client, or similar legal privilege and may have to be disclosed if the law requires it.

6. Email, Text Message, and Phone Communications

Service messages. When you enroll, we send the messages needed to run your Program: booking confirmations and reminders, homework emails, billing receipts, renewal reminders, cancellation confirmations, and account notices. You cannot opt out of required service messages while you are an active client, because they carry information our policies and the law require us to send.

Marketing email. We may send educational content, program updates, and offers by email. Every marketing email includes an unsubscribe link, and we honor opt-outs promptly.

Text messages (SMS/MMS). We send marketing or promotional texts only if you have separately opted in, for example by checking an unchecked box on a form or texting a keyword to us. Opting in is never a condition of buying anything. Message frequency varies. Message and data rates may apply. Reply **STOP**

to opt out at any time or **HELP** for help. Opting out of marketing texts does not affect your enrollment or your service messages.

Mobile information is never shared for marketing. We do not sell, rent, or share your mobile phone number or text-messaging opt-in data with third parties or affiliates for their marketing or promotional purposes. Text-messaging originator opt-in data and consent will not be shared with any third party, except the service providers that deliver our messages on our behalf.

Phone calls. If you give us express written consent through our Communication Consent form, we may call or text you to follow up on your interest, including by automated technology. That consent covers MMB Financial Coaching only and is not a contract for services. We call only between 8:00 a.m. and 9:00 p.m. in your local time, identify ourselves and MMB at the start of each call, and honor do-not-call requests immediately.

Consent records. We keep a record of each consent and opt-out, including the date, time, and method, so we can prove and honor your choices.

7. How We Share Information

We do not sell your personal information, and we do not share it for cross-context behavioral advertising. We share it only in these situations:

- **Service providers.** Companies that run parts of our business on our behalf, under contracts that limit their use of your information to serving MMB: our website, booking, membership, and blog platform (Wix); payment processors; video-meeting and phone providers (such as Zoom); email and text-message delivery providers; cloud storage, productivity, and scheduling tools; and accountants and bookkeepers.
- **Affiliated companies, only at your direction.** MMB is sponsored by and affiliated with Accudo Capital Investments and The Pimpleton Agency, which offer licensed investment, retirement, insurance, and estate services that MMB does not. When a question moves into their territory, we will offer a referral. We transfer your information to an affiliate only after you ask for or agree to the referral, and only what is needed for it. After that, the affiliate's own privacy notice and client agreement govern your information. We do not share your information with other affiliated companies, including BluSky Capital or Revayah, unless you ask us to.
- **Professional advisors.** Our attorneys, auditors, and insurers, under duties of confidentiality, when needed to advise or protect MMB.
- **Legal requirements and safety.** When required by law, subpoena, court order, or regulatory request, or when needed to protect the rights, property, or safety of you, MMB, or others, or to prevent fraud.
- **Business transfers.** If MMB or TPA Holdings LLC is involved in a merger, sale, reorganization, or transfer of assets, your information may transfer to the successor, which must honor this policy for information collected under it.
- **With your consent.** For any other purpose we describe to you at the time and you approve, such as publishing a testimonial.

We may share combined or de-identified information that cannot reasonably identify you, for example program-wide completion rates.

8. Cookies and Similar Technologies

Our websites use cookies and similar technologies, most of them set by our website platform, to:

- **Operate the site (essential):** keep you logged in, secure your session, remember your cart and bookings, and process checkout. The site cannot work properly without these.
- **Understand usage (analytics):** count visits and see which pages and articles are useful, in aggregate.
- **Remember preferences (functional):** such as language or consent choices.

We do not currently use advertising cookies or pixels that track you across other websites. If we add them, we will update this policy first and give you a way to opt out.

You can block or delete cookies in your browser settings; blocking essential cookies may prevent log-in or checkout. We treat a Global Privacy Control (GPC) browser signal as a request to opt out of any sale or sharing of your information. Because we do not sell or share it, no further action is needed on your part.

9. How We Protect Your Information

We use administrative, technical, and physical safeguards appropriate to the sensitivity of financial information, including:

- Encrypted (HTTPS/TLS) connections on our websites and checkout.
- Payment processing by PCI-compliant processors, so MMB never holds full card numbers.
- Access limited to staff and coaches who need it for your Program, with unique log-ins and multi-factor authentication where available.
- Asking clients to redact account numbers and Social Security numbers, and deleting them when received by mistake.
- Confidentiality obligations for staff, coaches, and service providers.
- Secure deletion of records at the end of their retention period.

No system is completely secure, and we cannot guarantee the security of information sent to us over the internet or by email. Please protect your account password and tell us right away at the contact below if you believe your account has been compromised.

If a breach occurs. If personal information is accessed or acquired without authorization in a way that creates a risk of harm, we will notify affected individuals and, where required, regulators, within the time and in the manner required by applicable law.

10. How Long We Keep Information

We keep personal information only as long as needed for the purposes in this policy, then delete or de-identify it.

Record	How long we keep it
Contact-form inquiries from non-clients	Up to 2 years from last contact, unless you enroll

Record	How long we keep it
Coaching records (notes, homework, worksheets, intake forms)	Length of your enrollment plus 3 years
Billing, payment, refund, and tax records	7 years from the transaction
Signed agreements and disclosures	Length of your enrollment plus 7 years
Communication consents and opt-outs	5 years from the consent or opt-out
Group session recordings, if any	Up to 12 months from the session
Website analytics data	As set by our website platform, generally no more than 26 months

We may keep information longer if the law requires it or if it is needed for a pending dispute, investigation, or legal claim. When you ask us to delete your information (Section 11), we will delete what we are not legally required to keep.

11. Your Rights and Choices

Wherever you live, and whether or not a law requires it, you may ask MMB to:

- **Access** the personal information we hold about you and receive a copy, including in a portable format.
- **Correct** information that is inaccurate or incomplete.
- **Delete** your personal information, subject to the retention exceptions in Section 10.
- **Opt out** of marketing emails, texts, and calls at any time (Section 6), and of any future sale, sharing, or targeted advertising.
- **Limit** use of sensitive information, including your financial details, to what is needed to deliver the Program.
- **Withdraw consent** you have given, such as for a testimonial or an affiliate referral, going forward.

How to make a request. Email ga@mmbfinancialcoaching.com with the subject line "Privacy Request," or write to us at the address in Section 15. We will verify your identity by matching information we already hold, and will respond within 45 days, or tell you if we need up to 45 more days and why. You may use an authorized agent with your signed permission.

Appeals. If we decline your request, we will explain why. You may appeal by replying to our decision with the subject line "Privacy Appeal," and we will respond within 60 days. If you remain unsatisfied, you may contact your state attorney general or data-protection authority.

No retaliation. We will not deny service, charge a different price, or reduce the quality of coaching because you exercised a privacy right. Deleting information needed to deliver an active membership may, however, mean we cannot continue that membership.

California residents. You may request the categories and specific pieces of personal information we collected about you, the sources, the business purposes, and the categories of recipients, all of which are

described in Sections 3, 4, and 7. We do not sell or share personal information as those terms are defined in California law.

12. Clients Outside the United States

MMB is based in the United States and serves clients in the United States, Canada, the United Kingdom, and English-speaking clients in Mexico and South America. Your information is stored and processed in the United States, where privacy laws may differ from those in your country. We protect it as described in this policy wherever it is processed, and where required we use contractual safeguards with our service providers for international transfers.

United Kingdom clients. MMB is the controller of your personal data. Our legal bases for processing are: performance of our contract with you (delivering the Program and billing); your consent (marketing texts, recordings, testimonials, affiliate referrals, and any financial details you choose to share beyond what the Program requires); our legitimate interests (improving the Program, securing our services, and marketing emails to existing clients, which you may opt out of); and legal obligation (tax and accounting records). You have the rights in Section 11, plus the right to object to processing based on legitimate interests and to complain to the Information Commissioner's Office (ico.org.uk).

Canadian clients. We collect, use, and disclose your information with your consent, for the purposes described in this policy. You may withdraw consent, subject to legal and contractual limits, and may complain to the Office of the Privacy Commissioner of Canada or your provincial privacy authority. Our privacy contact is named in Section 15.

Mexico and South America. You may exercise your rights of access, correction, cancellation (deletion), and objection, and withdraw consent, using the process in Section 11.

13. Children and Family Members

Children. Our websites and Services are intended for adults 18 and older. We do not knowingly collect personal information online from children under 13. If we learn that we have, we will delete it. Contact us if you believe a child has given us information.

Family plans. Some memberships, including Premier, may include a client's children or parents while the plan is active. The enrolling adult must have authority to share each family member's information and, for any family member under 18, be that minor's parent or legal guardian and give written consent before the minor takes part. We collect only the family information needed for the plan, use it only to deliver it, and handle it under this policy. Adult family members may exercise their own rights under Section 11.

Information about others. When you tell us about a spouse, dependent, co-borrower, or business partner, please share only what is needed for your coaching and only if you have the right to share it.

14. Third-Party Sites, Digital Products, AI Tools, and Testimonials

Third-party sites and platforms. Our Services link to or run on third-party sites, including Zoom, our payment processors, annualcreditreport.com, social media, podcast platforms, and affiliated companies'

websites. Their own privacy policies govern what they collect. Digital products purchased through a third-party storefront (such as Payhip) are also subject to that storefront's privacy policy.

AI-assisted tools. MMB uses artificial-intelligence tools to help prepare curriculum, worksheets, articles, and other educational content. We do not enter information that identifies you, or your personal financial details, into third-party AI tools unless the tool is contractually bound not to use it to train its models and to keep it confidential, and only to deliver your Program. We do not use AI to make automated decisions that have legal or similarly significant effects on you.

Testimonials and reviews. We publish a client's name, story, quotes, results, or image only with that client's written permission, which may be withdrawn for future use at any time. Testimonials reflect individual experiences and are not a guarantee of results.

15. Changes to This Policy and How to Contact Us

We may update this Privacy Policy as our Services or the law change. We will post the updated version with a new effective date. If we make a material change to how we use or share personal information, we will notify active clients by email before it takes effect and, where the law requires, ask for your consent.

Contact us about privacy:

- MMB Financial Coaching, a division of TPA Holdings LLC
- 30 N Gould St, Ste R, Sheridan, WY 82801
- Privacy and legal: ga@mmbfinancialcoaching.com
- General questions: info@mmbfinancialcoaching.com
- Phone: (843) 214-4069
- Websites: www.mmbfc.money and www.mmbfinancialcoaching.com

Cancellation requests go to cancel@mmbfinancialcoaching.com and new-member support to onboarding@mmbfinancialcoaching.com, as described in our Terms and Conditions.

By using MMB Financial Coaching's websites or Services, you acknowledge that you have read and understood this Privacy Policy.