

THE HORSWELL GROUP, LLC

PRIVACY POLICY

Effective Date: 5/9/2026

Last Updated: 5/9/2026

THE HORSWELL GROUP, LLC, including its current and future subsidiaries, affiliates, related entities, successors, and assigns under common ownership or control (collectively, “Company,” “we,” “us,” or “our”), respects your privacy and is committed to protecting personal information.

This Privacy Policy explains how we collect, use, disclose, safeguard, and otherwise process information when you:

- visit our websites;
- access our applications;
- purchase products or services;
- subscribe to memberships or communications;
- interact with our platforms;
- join communities;
- submit forms;
- communicate with us;
- or otherwise interact with any digital properties, services, or technologies operated by the Company (collectively, the “Platform”).

By using the Platform, you acknowledge that you have read and understood this Privacy Policy.

1. INFORMATION WE COLLECT

We may collect the following categories of information:

A. IDENTIFIERS

Including:

- name;
 - email address;
 - phone number;
 - mailing address;
 - billing address;
 - IP address;
 - account identifiers;
 - usernames;
 - device identifiers;
 - and similar identifiers.
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B. COMMERCIAL INFORMATION

Including:

- products or services purchased;
- transaction history;
- order information;
- subscription information;
- membership information;
- customer support interactions;
- and purchase activity.

C. INTERNET OR NETWORK ACTIVITY

Including:

- browser type;
- operating system;
- device information;
- referring URLs;
- pages viewed;
- links clicked;
- dates and times of visits;
- session activity;
- usage patterns;
- and interactions with Platform content.

D. PAYMENT & TRANSACTION INFORMATION

If you make a purchase, we may collect information necessary to process transactions, including:

- billing details;
- order details;
- transaction records;
- and related purchase information.

Payment information (such as payment card information) is processed by third-party payment processors including Wix Payments, Stripe, or similar providers and is not stored directly by us.

These third parties process payment information according to their own privacy and security policies.

E. COMMUNICATION INFORMATION

Including:

- emails;
- messages;
- support requests;
- survey responses;
- feedback;
- testimonials;
- community interactions;
- SMS/text message preferences;
- and communication history.

F. INFERENCES & PREFERENCES

Including:

- interests;
- preferences;
- engagement patterns;
- and insights derived from interactions with our Platform, content, communications, advertisements, or services.

G. COOKIES, PIXELS & TRACKING TECHNOLOGIES

We may use:

- cookies;
- pixels;
- tags;
- analytics tools;
- remarketing technologies;
- and similar technologies

to:

- operate and maintain the Platform;
- improve functionality and performance;
- analyze user behavior;
- personalize experiences;
- support advertising;
- measure campaign effectiveness;
- and enhance Platform operations.

These technologies may be provided by third-party analytics, advertising, hosting, or marketing providers.

2. HOW WE USE YOUR INFORMATION

We may use personal information for the following purposes:

- to provide, operate, maintain, and improve the Platform;
- to process purchases and transactions;
- to fulfill orders and provide access to digital products;
- to manage subscriptions and memberships;
- to provide customer support;
- to communicate with Users;
- to send email communications;
- to send SMS/text communications where permitted by applicable law and appropriate consent has been obtained;
- to send marketing, advertising, promotional, transactional, or informational communications;
- to personalize content and user experiences;
- to analyze website usage and engagement;
- to support advertising and remarketing efforts;
- to maintain security and prevent fraud;
- to detect abuse, unauthorized access, or illegal activity;
- to enforce our policies and agreements;
- to comply with legal obligations;
- and to support legitimate business operations.

3. EMAIL, SMS & MARKETING COMMUNICATIONS

If you provide contact information, you may receive:

- marketing communications;
- promotional communications;
- informational communications;
- transactional communications;
- membership communications;
- service-related notices;
- newsletters;
- direct mail;
- email communications;
- and SMS/text communications where appropriate consent has been obtained.

Consent to receive email communications does not necessarily constitute consent to receive SMS/text communications, and communication preferences may be managed separately where applicable.

You may opt out of:

- marketing emails by using unsubscribe links;
- SMS/text communications by following opt-out instructions provided in messages;
- or certain communications by contacting us directly.

We may continue sending non-marketing transactional or operational communications where permitted by law.

We honor opt-out requests in accordance with applicable law.

4. ADVERTISING, ANALYTICS & DATA ENRICHMENT

We may use third-party providers including analytics platforms, advertising providers, remarketing services, and marketing technologies that may:

- collect information regarding interactions with the Platform;
- track activity across websites and devices;
- support targeted or interest-based advertising;
- measure advertising performance;
- support campaign optimization;
- and improve marketing operations.

Third-party providers may independently process information according to their own privacy policies.

We may also use third-party data providers to:

- improve data accuracy;
- update contact information;
- better understand audience preferences;
- and support business and marketing operations.

5. HOW WE DISCLOSE INFORMATION

We do not sell personal information for monetary value.

We do not share personal information for cross-context behavioral advertising in a manner constituting a “sale” or “sharing” under applicable privacy laws unless disclosed otherwise in future updates.

We may disclose information in the following circumstances:

A. SERVICE PROVIDERS

To vendors and providers assisting with:

- hosting;
- payment processing;
- analytics;
- communications;
- email delivery;
- SMS delivery;
- customer support;
- advertising;
- security;
- fraud prevention;
- cloud infrastructure;
- and Platform operations.

B. AFFILIATES & RELATED ENTITIES

We may share information with:

- subsidiaries;
- affiliates;
- parent entities;
- and related entities

for operational, administrative, business, customer support, security, marketing, communication, and Platform-management purposes.

All such entities will use information in accordance with this Privacy Policy.

C. LEGAL COMPLIANCE & PROTECTION

We may disclose information:

- to comply with legal obligations;
- respond to lawful requests;
- enforce agreements;
- investigate fraud or security incidents;
- protect rights or safety;
- or defend legal claims.

D. BUSINESS TRANSFERS

Information may be transferred in connection with:

- mergers;
- acquisitions;
- restructurings;
- financings;
- asset sales;
- or other corporate transactions.

6. DATA RETENTION

We retain information only for as long as reasonably necessary to:

- fulfill purposes described in this Privacy Policy;
- provide services;
- comply with legal obligations;
- resolve disputes;
- maintain records;
- enforce agreements;
- and support legitimate business operations.

Retention periods may vary depending on the nature of the information and applicable legal requirements.

7. DATA SECURITY

We implement commercially reasonable administrative, technical, organizational, and physical safeguards designed to help protect information.

However, no system, transmission method, or storage technology can be guaranteed completely secure.

Users acknowledge and accept inherent cybersecurity and internet-transmission risks associated with digital platforms and online communications.

8. YOUR PRIVACY RIGHTS

Depending on your jurisdiction, you may have rights under applicable privacy laws, including rights to:

- access information;
- request correction;
- request deletion;
- request portability;
- opt out of certain processing activities;
- limit certain uses;
- or request additional information regarding our data practices.

We may take reasonable steps to verify identity before processing requests.

To submit requests, contact:

PRIVACY@TEAMTHG.COM

OR

**PO BOX 14448
HUMBLE, TX 77347**

We will respond within timeframes required by applicable law.

9. COOKIES & TRACKING CHOICES

Users may control cookies and certain tracking technologies through:

- browser settings;
- device settings;
- cookie preferences;
- and other available controls.

Some browser “Do Not Track” signals may not be recognized by the Platform.

Disabling certain technologies may affect Platform functionality.

10. CHILDREN’S PRIVACY

The Platform is not directed toward children under thirteen (13), and we do not knowingly collect personal information from children under thirteen.

If we become aware that information has been collected from a child under thirteen in violation of applicable law, we may take steps to delete such information.

11. THIRD-PARTY LINKS & SERVICES

The Platform may contain links to third-party websites, services, applications, or platforms.

We are not responsible for the privacy practices, security, content, or operations of third parties.

Users should review third-party privacy policies independently.

12. INTERNATIONAL USERS

The Platform is operated from the United States.

Users accessing the Platform internationally understand that information may be processed, transferred, and stored in the United States or other jurisdictions where privacy laws may differ from those of their home jurisdiction.

Where required, we will comply with applicable legal requirements governing international data transfers.

13. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify or update this Privacy Policy at any time in our sole discretion.

Updated policies become effective upon posting unless otherwise stated.

The “Last Updated” date reflects the most recent revision date.

Continued use of the Platform following updates constitutes acknowledgment of the revised Privacy Policy.

14. CONTACT INFORMATION

Questions regarding this Privacy Policy may be directed to:

THE HORSWELL GROUP, LLC

PRIVACY@TEAMTHG.COM

PO BOX 14448

HUMBLE, TX 77347