

Privacy & Cookie Policy

Last updated: 9 February 2026

1. Overview & Binding Agreement

This Privacy & Data Policy ("Policy") forms an integral part of the legal agreement between you ("User") and Millylearn ("Millylearn," "we," "us," "our," or "Milly") when accessing or using any website, mobile application, subdomain, API, or digital service under the Millylearn brand (collectively, the "Platform").

By using the Platform, you acknowledge and agree to the practices, rights, and obligations described in this Policy. This Policy is governed exclusively by the laws of the State of Israel. In the event of any conflict with applicable international laws or regulations, Israeli law shall prevail to the fullest extent permitted. Nothing in this Policy shall derogate from any non-waivable statutory rights to which you are legally entitled.

2. Scope of Application

This Policy applies globally and governs how we collect, use, store, and disclose data across the entire lifecycle of your interaction with the Platform, including:

- Platform usage - such as account activity, interactions, assessments, and personalization;
- Backend infrastructure - including servers, databases, and analytics pipelines;
- Third-party integrations - such as cloud services, analytics tools, and external processors.

This Policy applies across all digital devices, including but not limited to mobile phones, tablets, desktop computers, smart TVs, wearable devices, and any future technologies or access channels used to interact with the Platform.

3. Legal Basis for Data Processing

We process personal data in accordance with applicable data protection laws and under the following legal bases:

- Contractual necessity - to enable account creation, user authentication, access control, and the delivery of educational services;

- Legitimate interests – including fraud prevention, platform performance optimization, behavioral analysis, and the training of AI/ML models using de-identified data;
- Consent – for the use of cookies, marketing communications;
- Legal obligation – to comply with regulatory requirements such as tax reporting, age verification, and lawful disclosures to authorities.

We collect and process only the information necessary to operate, secure, and improve the Platform, including identifiers, usage patterns, and user-generated content, in accordance with the principles of purpose limitation and data minimization.

4. Cookies & Tracking Technologies

To ensure secure and reliable operation of the Platform, we use essential cookies and similar technologies for core functionality such as session continuity, authentication, and load balancing.

Some Platform features may not function properly without these technologies. By using the Platform, you acknowledge and accept their use as technically necessary. Optional analytics or marketing cookies, where applicable, are used only with your consent and can be controlled via browser settings or our cookie banner.

5. Data Use Objectives

We process your data for the following purposes:

1. To operate, personalize, and optimize Platform services, including AI-driven features and adaptive learning experiences;
2. To maintain system integrity, detect abuse, prevent fraud, and enforce security measures;
3. To train and refine AI/ML models using anonymized or de-identified user data such as classifications, associations, and performance indicators;
4. To license, commercialize, or publish anonymized or aggregated datasets for educational, analytical, or research purposes;
5. To send transactional communications such as login verifications, usage updates, and system alerts;
6. To deliver promotional messages, product updates, or personalized marketing campaigns, unless you opt out (see Section 7).

We do not guarantee that any content, insights, analytics, or recommendations delivered via the Platform are accurate, current, or suitable for your particular needs. You are solely responsible for evaluating and relying on Platform-provided information, and assume all risk associated with its use.

6. Data Sharing & Transfers

We may share or transfer data with trusted third parties under strict contractual and legal safeguards, including:

- Cloud infrastructure providers, operating under GDPR-compliant Data Processing Agreements (DPAs);
- Payment processors that are certified under PCI-DSS standards;
- Analytics and marketing partners, but only with your consent or using pseudonymized data that does not directly identify you;
- Corporate transactions, such as mergers, acquisitions, restructuring, or asset transfers;
- Legal compliance, in response to valid legal requests or to satisfy statutory obligations.

Where reasonably necessary to protect the rights, safety, or legitimate interests of Millylearn, its users, or the public, we may disclose user data to third parties or authorities without a court order, in accordance with applicable law.

Your data may be processed or stored in jurisdictions outside your own. For users in the EEA/UK, international transfers rely on recognized legal mechanisms, including Standard Contractual Clauses (SCCs), along with technical safeguards such as encryption and access control.

User-submitted content - including custom units, answers, messages, and any other material - must not contain unlawful, infringing, defamatory, or harmful content. We reserve the right to review, block, or remove such content or user accounts at our sole discretion to ensure compliance with applicable law and Platform standards.

7. Marketing Communications

By registering or providing your contact information, you consent to receive marketing and informational communications from Millylearn, including:

- Product updates, educational content, feature announcements, and promotional offers;

- Messages delivered via email, SMS, or in-app notifications.

You may opt out of marketing communications at any time by using the unsubscribe link provided in our messages or by updating your preferences in the Platform settings. Opting out will not affect your receipt of transactional or legally required messages, such as login confirmations, account alerts, or service notices.

We may also use anonymized behavioral patterns - including classifications, session activity, and learning interactions - to build marketing segments, generate lookalike audiences, and optimize outreach campaigns. These processes do not involve the use of personal identifiers and are conducted in compliance with applicable privacy laws.

8. Children's Privacy & Parental Consent

Millylearn is open to users under 18 for educational purposes. Where required by law, we rely on parental or school-provided consent before activating accounts for minors.

Parents can review or delete their child's account anytime by emailing dpo@Millylearn.com. We don't use children's data for advertising and only process it to support learning.

By using Millylearn, minors confirm proper consent has been obtained.

9. Data Retention

We retain data for only as long as necessary to fulfill the purposes outlined in this Policy, subject to legal, regulatory, and operational requirements:

- Personal data is retained for up to seven (7) years from your last recorded activity, or longer if required by applicable law (e.g., for legal compliance, dispute resolution, or audit purposes).
- Anonymized or aggregated data - which cannot be used to identify you - is retained indefinitely and may be used for research, AI model development, benchmarking, or commercial analysis.
- If a Creator removes a course or if Millylearn discontinues hosting it, we may retain residual metadata or access logs associated with the course for audit, compliance, and system integrity purposes. However, student access to the course content will end immediately, even if previously marked as "lifetime."

Data may be deleted or de-identified earlier upon verified request, subject to limitations imposed by law or legitimate business needs.

10. Data Commercialization

We reserve the right to commercially utilize Platform-derived data, provided it has been properly anonymized or de-identified in accordance with applicable law. Specifically, we may:

- Sell, license, or analyze de-identified classification data, usage metrics, exam results, and behavioral patterns;
- Use anonymized datasets to train, validate, and improve AI/ML models, including those used for personalized learning, predictive analytics, and education research;
- Generate market insights, benchmarking reports, and product optimization strategies based on aggregated user trends.
- We use irreversible de-identification techniques such as hashing, aggregation, and differential privacy to ensure that AI training data cannot be linked back to individuals.

We do not sell personal identifiers or identifiable user profiles. All commercialization is conducted using data that cannot be traced back to a specific individual, ensuring compliance with privacy regulations such as the Israeli Privacy Protection Law, GDPR, and CCPA.

11. Instructor & Creator Data

If you publish or contribute educational content on Millylearn, we collect and process certain information such as profile data, payment details, tax documentation, engagement metrics, and payout history. We use this information to facilitate revenue sharing, display content analytics, manage compliance obligations, and protect against fraud or abuse.

By becoming a Creator, you acknowledge that your content, name, and other public-facing elements may be displayed to users globally, and may be indexed by search engines or third-party platforms.

12. Third-Party Services & Links

The Platform may contain links to, or integrate with, third-party websites, services, tools, or APIs that are not operated or controlled by Millylearn.

We do not make any representations regarding the accuracy, lawfulness, security, or data practices of these external services. Your use of such services is entirely at your own risk and governed by the respective third party's terms, conditions, and privacy policies, which we encourage you to review carefully.

Millylearn disclaims all liability arising from your interaction with third-party platforms, including any data collection, processing, or usage that occurs outside our control.

13. Changes to This Policy

We may update or modify this Privacy & Data Policy from time to time to reflect changes in our practices, technologies, legal requirements, or business operations.

Where required by law or at our discretion, we will notify you of material changes via email or a prominent notice within the Platform.

Your continued use of the Platform after such notice constitutes your binding acceptance of the updated Policy. If you do not agree to the revised terms, you must discontinue use of the Platform.

You have the right to request access to your data, download a copy in a machine-readable format, correct inaccurate information, or request deletion of your account and associated data. Requests can be submitted to:
dpo@Millylearn.com

14. Contact & Complaints

If you have any questions, concerns, or requests regarding this Policy or your personal data, you may contact us at:

- Data Protection Officer (DPO): dpo@Millylearn.com
- Legal Contact: legal@Millylearn.com
- Registered address: 6 Brandeis Street, Petah Tikva 4929451, Israel.