

WELEARN PRIVACY POLICY

Last Updated: 28 September 2026

ZENTIX PTE. LTD. ("ZENTIX", "we", "us" or "our") operates the WELEARN mobile application and related services ("WELEARN", the "App" or the "Service").

We respect your privacy and are committed to protecting the personal information of our users, including students and younger learners.

This Privacy Policy explains what information we collect, how we use it, how we share it, how we protect it, and the choices available to you when you use WELEARN.

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

1. Who We Are

WELEARN is operated by:

ZENTIX PTE. LTD.

Singapore

Email: info@zentix.com.sg

Data Protection Officer: Gary Oh

For privacy-related questions, requests or concerns, please contact us using the details above.

2. Information We Collect

We aim to collect only information reasonably necessary to provide and improve WELEARN.

2.1 Account Information

When you create an account, we may collect:

- Name
- Email address
- Profile photograph
- Account credentials or authentication information
- Information necessary to manage your subscription

We do not intentionally require students to provide unnecessary personal information.

2.2 Learning and Usage Information

When you use WELEARN, we may collect information associated with your account, including:

- Questions attempted
- Answers submitted
- Correct and incorrect answers
- Learning progress

- Practice history
- Scores and results
- Areas of strength and areas requiring improvement
- Time spent on learning activities
- Features used within WELEARN
- AI-generated explanations, feedback and learning reports associated with your account

This information allows us to provide personalised learning experiences and help users understand their learning progress.

2.3 Images Uploaded Through Snap & Solve

WELEARN includes features that allow users to photograph or upload an image of a question, worksheet, exercise or other educational material for analysis.

When you use these features, we may collect and store:

- The uploaded image
- Information associated with the image
- The question or educational content contained in the image
- AI-generated analysis, answers, explanations or feedback relating to the image

Uploaded images may be retained for the duration of the relevant account and may remain stored unless deleted in accordance with our account deletion procedures or applicable legal requirements.

Users should avoid uploading images containing unnecessary personal information, including photographs, identification documents, addresses, phone numbers or other sensitive information.

2.4 Technical Information

To operate, secure and improve WELEARN, we may automatically receive certain technical information, such as:

- Device type
- Operating system
- App version
- Device identifiers or similar technical identifiers
- IP address
- Crash and diagnostic information
- General information about how the App is used

We use this information primarily for security, troubleshooting, analytics and service improvement.

3. How We Use Information

We may use information collected through WELEARN to:

1. Create and manage user accounts;
2. Provide access to WELEARN and its features;
3. Provide educational questions, exercises and learning activities;

4. Process uploaded images through Snap & Solve;
5. Generate AI-powered explanations, answers, feedback and reports;
6. Track learning progress and practice history;
7. Personalise learning experiences;
8. Improve the accuracy, reliability and functionality of WELEARN;
9. Diagnose technical problems and prevent fraud or abuse;
10. Process subscriptions and payments;
11. Communicate with users about their accounts and the Service;
12. Respond to support requests;
13. Maintain the security and integrity of the Service; and
14. Comply with applicable laws, regulations and legal obligations.

We do not sell users' personal information.

4. Artificial Intelligence and AI Service Providers

Some WELEARN features use artificial intelligence technology provided by third-party AI service providers, including OpenAI and Microsoft Azure.

We may use these AI services for functions such as:

- Analysing questions and educational content;
- Processing images submitted through Snap & Solve;
- Generating answers and explanations;
- Providing learning feedback;
- Generating learning reports and insights; and
- Supporting other AI-powered features within WELEARN.

4.1 OpenAI

WELEARN uses OpenAI API services for certain AI-enabled functions.

When a user submits information for processing through an OpenAI-powered feature, relevant information may be transmitted to OpenAI. This may include the uploaded image, question or educational content, together with information necessary to process the request.

Based on OpenAI's applicable API privacy commitments, OpenAI states that data submitted through its API is not used to train or improve its models by default unless the customer explicitly opts in.

4.2 Microsoft Azure

WELEARN also uses Microsoft Azure services for certain AI-related functions.

Depending on the feature being used, information submitted to WELEARN may be processed through Microsoft Azure AI services. This may include uploaded images, questions, educational content, answers, prompts, or other information necessary to provide the relevant AI functionality.

Microsoft Azure may process such information on our behalf as a service provider in accordance with the applicable Microsoft terms, contractual commitments and data protection requirements.

We configure and use Azure services for the purposes of providing WELEARN's AI-powered features and related functionality. We do not intentionally use these services to sell users' personal information.

Where appropriate, we may use different AI providers for different WELEARN features. The specific AI technology used may change as we develop, improve or update the Service.

4.3 AI-Generated Content

AI-generated answers, explanations, feedback and learning reports may not always be accurate or complete.

AI-generated content is provided to support learning and should not be treated as a guaranteed or authoritative answer. Users and parents or guardians should exercise appropriate judgement when relying on AI-generated educational content.

We may update or change the AI technologies and providers used by WELEARN from time to time.

5. Children's Privacy

WELEARN may be used by students under the age of 13.

Because children require additional privacy protection, we take reasonable steps to minimise the personal information collected from younger users.

Where applicable law requires parental or guardian consent before collecting personal information from a child, we will take appropriate steps to obtain or facilitate that consent.

Parents and legal guardians are encouraged to supervise children's use of WELEARN and to ensure that children do not upload unnecessary personal information through Snap & Solve or other features.

WELEARN does not intentionally request sensitive personal information from children.

We do not knowingly sell children's personal information.

If you are a parent or legal guardian and believe that a child has provided personal information to WELEARN without appropriate consent, please contact us at:

info@zentix.com.sg

We will review the request and take appropriate action in accordance with applicable laws.

6. Information We Share

We may share information with trusted third-party service providers where reasonably necessary to operate WELEARN.

These providers may include:

- Cloud hosting and storage providers, including Microsoft Azure;
- AI technology providers, including OpenAI and Microsoft Azure;
- Payment and subscription providers;
- Authentication providers;
- Analytics and diagnostic providers;
- Customer support providers; and

- Security and fraud-prevention providers.

Our service providers are authorised to process information only for purposes connected with providing their services to us, subject to applicable contractual and legal requirements.

We may also disclose information:

- Where required by law;
- In response to lawful requests from government or regulatory authorities;
- To protect the rights, safety or property of ZENTIX, our users or others;
- To investigate fraud, security incidents or misuse; or
- In connection with a corporate transaction such as a merger, acquisition, restructuring or sale of assets.

7. Payments and Subscriptions

WELEARN may offer a free trial followed by a paid subscription.

Payments made through Apple's App Store are processed by Apple in accordance with Apple's applicable terms and privacy policies. ZENTIX does not receive your full Apple payment-card details through the App Store.

Subscription information may be provided to us to allow us to determine whether your subscription is active and which features you are entitled to access.

8. Data Retention

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

- Provide WELEARN;
- Maintain user accounts;
- Maintain learning history and progress;
- Provide requested features;
- Meet legal, accounting or regulatory obligations;
- Resolve disputes;
- Enforce our agreements; and
- Protect the security of our Service.

Uploaded Snap & Solve images may be retained as part of the user's learning history.

When an account is deleted, we will take reasonable steps to delete or anonymise personal information associated with that account, subject to information that we are legally required or reasonably permitted to retain.

Some information may remain in backups for a limited period before being securely deleted or overwritten.

9. Account Deletion

Users may request deletion of their WELEARN account through the account deletion function available within the App or by contacting us at:

info@zentix.com.sg

When an account is deleted, we will take reasonable steps to delete associated personal information, subject to applicable legal or legitimate retention requirements.

Some information may remain in backups for a limited period before being securely deleted or overwritten.

10. Access, Correction and Other Requests

Subject to applicable law, you may have rights to:

- Request access to personal information we hold about you;
- Request correction of inaccurate information;
- Request deletion of personal information;
- Withdraw consent where processing is based on consent; and
- Ask questions about how your information is collected or used.

Requests may be submitted to:

info@zentix.com.sg

We may need to verify your identity before processing a request.

Where the account belongs to a child, we may require the request to be made or confirmed by a parent or legal guardian where required by applicable law.

11. Data Security

We use reasonable technical and organisational safeguards designed to protect personal information against unauthorised access, collection, use, disclosure, alteration or destruction.

These measures may include access controls, authentication mechanisms, encryption during transmission and other security measures appropriate to the nature of the information.

However, no method of electronic transmission or storage is completely secure. We cannot guarantee absolute security.

12. International Data Transfers

Some of our service providers, including technology, cloud and AI providers, may process information outside Singapore.

Where personal information is transferred outside Singapore, we will take reasonable steps to ensure that the transfer and subsequent processing are conducted in accordance with applicable data protection laws.

13. Third-Party Services

WELEARN may use or integrate third-party services, including services provided by Apple, OpenAI, Microsoft Azure and other technology providers.

Third-party services may have their own privacy policies and terms. This Privacy Policy does not govern the privacy practices of independent third parties.

Users should review the relevant third-party privacy policies where appropriate.

14. Educational Information

WELEARN may generate learning statistics, reports and insights based on a user's activity.

These may include information such as:

- Questions completed;
- Accuracy;
- Areas of difficulty;
- Practice history;
- Learning trends;
- AI-generated observations; and
- Suggested areas for further practice.

These reports are intended to support learning and should not be treated as professional educational, psychological, medical or other expert assessments.

15. Marketing Communications

We may send service-related communications, such as:

- Account notifications;
- Subscription information;
- Security notices;
- Important changes to WELEARN; and
- Customer support communications.

Where applicable, we will provide users with appropriate choices regarding promotional communications.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time.

When we make changes, we will update the "Last Updated" date at the beginning of this Privacy Policy.

Where changes are material, we may provide additional notice through the App or other appropriate means.

17. Governing Law

This Privacy Policy is governed by the laws of Singapore, unless applicable law requires otherwise.

18. Contact Us

If you have questions, concerns or requests regarding this Privacy Policy or your personal information, please contact:

ZENTIX PTE. LTD.

Singapore

Email: info@zentix.com.sg

Data Protection Officer: Gary Oh

— *End of Privacy Policy* —