

# Privacy Policy

**Last updated:** 27 March 2026

## 1) Who we are (Data Controller)

2Be VIP LLC (“2Be.vip”, “we”, “us”) operates an online learning platform and related services. We are registered in Sharjah Media City (Shams), Sharjah, United Arab Emirates.

**Registered address:** Shams Business Center, Sharjah Media City Free Zone, Sharjah, UAE

**Privacy contact:** [privacy@2be.vip](mailto:privacy@2be.vip)

**Support:** [support@2be.vip](mailto:support@2be.vip)

## 2) Scope

This Privacy Policy explains how we collect, use, store, share, and protect personal data when you use our website, apps (if any), learning platform, live classes, purchases/subscriptions (if any), and referral/affiliate program (if any) (collectively, the “Services”).

## 3) Personal data we collect

### A) Account and identity

- Name, email address, phone number
- Login credentials (passwords are stored as hashed/encrypted values)
- Country/city (if you provide it)

### B) Learning and usage

- Level selection and placement test results
- Course progress, completion, attendance, scores, assignments
- Messages and interactions within the platform

### C) Live sessions (if applicable)

- Session metadata (date/time, duration, participants)
- Audio, video, chat messages, and shared screens (depending on features used)

### D) Payments and purchases (if applicable)

- Billing details, invoices, transaction references, payment status
- We typically do not store full card details if you pay through a payment gateway

## **E) Referral / affiliate program (if applicable)**

- Referral code/link, sponsor/upline relationship, and referral structure data
- Commission and payout records (amounts, dates, status)
- Anti-fraud and compliance indicators (e.g., duplicate accounts, unusual activity)

## **F) Technical data**

- IP address, device and browser information, operating system
- Security logs, error logs, identifiers and cookies
- Analytics data (depending on your cookie choices)

## **4) How we collect data**

- Directly from you (registration, profile, purchases, support requests, live classes)
- Automatically (cookies, logs, analytics) when you use the Services
- From payment providers (transaction references and payment confirmations)
- From service providers that enable the platform (e.g., LMS, live-session tools)

## **5) Why we use your data**

- To provide and operate the Services (accounts, content access, live classes)
- To measure learning progress and improve the learning experience
- To process payments, manage invoicing, and prevent fraud
- To provide customer support and resolve issues
- To maintain security, monitor abuse, and enforce our terms
- To send service communications (important updates, security notices)
- To send marketing communications only if you opt in (you can opt out anytime)
- To run the referral/affiliate program and calculate commissions (if applicable)
- To comply with legal and regulatory obligations

## **6) Legal bases (global-standard approach)**

We process personal data under one or more of the following bases, as applicable:

- **Contract:** to deliver the Services you request
- **Consent:** for marketing, optional cookies, and similar activities where required

- **Legitimate interests:** security, fraud prevention, platform improvement, internal analytics (balanced against your rights)
- **Legal obligation:** accounting, tax, compliance, and responding to lawful requests

## 7) Live class recordings (if applicable)

If you attend live sessions, we may record sessions for quality assurance, training, dispute handling, safety, and service improvement. Recordings may include audio, video, chat, and shared screens.

Access is restricted to authorized staff and, when necessary, the relevant instructor. We retain recordings for **90 days**, then delete or anonymize them, unless longer retention is required to handle a complaint, dispute, or legal obligation.

## 8) Cookies and similar technologies

We use essential cookies to operate the Services (login, security, core functionality). With your choice, we may also use optional cookies for analytics and performance. You can manage cookie preferences via any cookie banner/settings (if available) and through your browser settings.

## 9) Sharing and disclosures

We do not sell your personal data. We may share limited data with:

- **Service providers:** hosting/cloud, LMS, live-class tools, payment processors, email/SMS providers, analytics and security tools
- **Affiliate/referral context (if applicable):** limited information may be visible within the referral structure (e.g., user ID, status, aggregated performance). We avoid sharing sensitive contact details unless necessary and permitted
- **Legal and protection:** to comply with lawful requests or to protect rights, security, and prevent fraud

## 10) International transfers

Your data may be processed or stored outside your country depending on where our vendors and infrastructure are located. We take reasonable steps to use reputable providers and appropriate safeguards.

## 11) Data retention

We keep personal data only as long as needed for the purposes described above:

- **Account data:** for as long as your account is active, plus **24 months** after account closure

- **Security logs: 12 months**
- **Payments, invoices, commissions, and payout ledgers: 7 years** (for accounting and tax compliance)
- **Live session recordings: 90 days** (unless extended for a complaint/dispute/legal obligation)
- **Identity verification (if required for payouts/compliance):** retained as required by applicable law and compliance needs

## **12) Security**

We use reasonable administrative, technical, and organizational safeguards (access controls, encryption in transit, monitoring, backups, and vendor due diligence). No method of transmission or storage is fully secure.

## **13) Your rights**

Depending on your location and applicable law, you may request access, correction, deletion, restriction, objection, withdrawal of consent, and other rights. To make a request, contact [privacy@2be.vip](mailto:privacy@2be.vip). We may verify your identity before responding.

## **14) Marketing choices**

You may opt out of marketing at any time by using the unsubscribe link (where available) or by contacting us. Service/transactional messages (e.g., security or platform updates) may still be sent when necessary.

## **15) Children**

Our Services are intended for adults unless explicitly stated otherwise. If we allow minors in specific offerings, parent/guardian consent may be required.

## **16) Third-party links**

Our Services may include links to third-party websites or services. Their privacy practices are governed by their own policies.

## **17) Changes to this policy**

We may update this Privacy Policy from time to time. We will post the updated version and change the “Last updated” date. If changes are material, we may provide additional notice via the platform or email.

## **18) Contact**

Privacy requests and questions: [privacy@2be.vip](mailto:privacy@2be.vip)  
Support: [support@2be.vip](mailto:support@2be.vip)