

Privacy Policy for Personal Information of Ruleway AI Legal Search Service

Article 1 (Purpose of Privacy Policy for Personal Information)

CÔNG TY TNHH BIG MOUTH (hereinafter referred to as "Company") values the personal information of users in operating the Ruleway AI Legal Search Service (hereinafter referred to as "Service") and strives to comply with relevant laws and regulations of Vietnam such as "Decree on Personal Data Protection," "Law on E-commerce Transactions," and "Law on Cybersecurity." Through this Privacy Policy for Personal Information, the Company provides guidance on matters related to the protection of users' personal information, including the items of personal information collected by the Company from users, the purpose of collection and use, the processing and retention period, as well as matters related to provision to third parties.

Article 2 (Items of Personal Information Collected and Collection Methods)

1. Items of Personal Information Collected

① Items Collected During Member Registration

- Required: Email address, password, nationality, name, contact information
- Optional: Company name, TAX information, address information

② Items Collected When Using Paid Services

- Subscription information: Subscription plan, subscription status, renewal date, suspension history
- Credit usage information: Credit purchase history, usage details, remaining credits
- Payment information is not stored but is managed by a professional payment service provider (Lemon Squeezy).

③ Information Generated During Service Usage

- Service usage history, search history, access logs, IP information, cookies, device information (device identification code, operating system information, etc.)
- AI search usage history, credit usage history, payment history, subscription information

④ Items Collected When Using Customer Support Services

- Inquirer information: Name, email address
- Inquiry-related information: Inquiry content, service usage-related information

2. Methods of Collecting Personal Information

The Company collects personal information through the following methods:

- Collection through active participation of users such as member registration, service usage, payment, inquiries.
- Collection through automatic collection tools during service usage (log analysis programs, cookies, etc.).

Article 3 (Purpose of Collecting and Using Personal Information)

The Company uses the collected personal information for the following purposes:

1. Providing Services and Performing Contracts

- Member management and service provision
- Providing AI legal search services
- Providing legal information and multilingual translation services
- User identification and authentication
- Subscription payment management

2. Providing Paid Services and Processing Payments

- Providing subscription services
- Payment processing and settlement
- Processing subscription renewal and cancellation
- Processing subscription suspension
- Credit management and providing additional credits

3. Improving and Developing Services

- Service usage statistics analysis
- AI model improvement and new service development
- Understanding access frequency and statistics on service usage
- Providing customized legal information

4. Marketing and Customer Support

- Providing event information and participation opportunities
- Notifying about new services and updates
- Providing advertising information (when consent to receive marketing information is given)

- Handling customer inquiries and complaints

5. Legal Compliance

- Fulfilling obligations under relevant laws and regulations
- Resolving disputes and handling complaints
- Preventing illegal use and service security

Article 4 (Retention and Use Period of Personal Information)

1. In principle, the Company will destroy users' personal information immediately upon achieving the purpose of collecting and using personal information. However, the following information will be retained for the specified period for the reasons stated below.

① Reasons for Information Retention Based on Company Internal Policy

- Illegal use records: 1 year after membership withdrawal
- Complaint handling and dispute resolution records: 3 years after membership withdrawal
- Service usage statistics information: 3 years after membership withdrawal

② Reasons for Information Retention Based on Relevant Laws and Regulations

- Records on contracts or withdrawal of offers: 5 years (Vietnam "Law on E-commerce Transactions")
- Records on consumer complaints or dispute resolution: 3 years (Vietnam "Law on Protection of Consumer Rights")
- Login logs: 3 months (Vietnam "Law on Cybersecurity")
- Payment-related records: 5 years (Vietnam relevant laws)

2. Personal Information Validity Period System

The Company will separately store and safely manage personal information of members who have not used the service for 1 year. Separately stored personal information will be destroyed after the retention period according to legal obligations. Users will receive notification via email before the personal information validity period expires, and if they still do not continue to use the service after receiving notification, the account will be converted to inactive status.

Article 5 (Procedures and Methods for Destroying Personal Information)

1. Destruction Procedures

The Company will immediately destroy personal information when the retention period expires or the processing purpose has been achieved. The destruction procedures are as follows:

- Information entered by users for member registration, service registration, etc., after the purpose has been achieved, will be transferred to a separate database and stored for a certain period according to internal policy and relevant laws and regulations before being destroyed.
- Personal information transferred to a separate database will not be used for any purpose other than retention purposes, unless required by law.

2. Destruction Methods

The Company will safely delete personal information recorded and stored in electronic file format so that records cannot be reproduced, and will destroy personal information recorded and stored on paper documents by shredding or burning.

Article 6 (Provision of Personal Information to Third Parties)

1. In principle, the Company does not provide users' personal information to external parties. However, the following cases are exceptions.

① When Users Have Given Prior Consent

- To provide services smoothly, the Company entrusts personal information processing tasks to external professional companies for operation, and details about this are specified in Article 7.

② When There is a Request from Investigative Agencies According to Procedures and Methods Stipulated in Laws and Regulations for Investigative Purposes, or According to Legal Provisions

2. Withdrawal of Consent for Providing Personal Information

Users can withdraw consent for providing personal information at any time. Withdrawal of consent can be done through the 'Settings' menu in the service or via email. However, when withdrawing consent, the use of services provided based on such consent may be restricted.

Article 7 (Entrusting Personal Information Processing and Transferring Personal Information Overseas)

1. The Company entrusts personal information processing tasks as follows to provide and improve services.

Entrusted Party	Entrusted Task Content	Retention and Use Period
Lemon Squeezy	Payment processing and settlement	Until membership withdrawal or termination of entrustment contract
Email delivery service provider	Sending notification emails	Until membership withdrawal or termination of entrustment contract

Entrusted Party	Entrusted Task Content	Retention and Use Period
Cloud service provider	Server and infrastructure operation	Until membership withdrawal or termination of entrustment contract

2. Management of Entrusted Tasks

When concluding entrustment contracts, the Company will clearly specify in documents such as contracts matters related to responsibilities such as prohibition of processing personal information beyond the purpose of performing entrusted tasks, technical and management protection measures, restrictions on re-entrustment, management and supervision of entrusted parties, compensation for damages, etc., in accordance with Vietnam's "Decree on Personal Data Protection" and other relevant legal provisions, and will supervise whether entrusted parties process personal information safely.

3. Changes in Entrusted Parties

If the content of entrusted tasks or entrusted parties change, we will immediately disclose through this Privacy Policy for Personal Information.

4. Matters Related to Transferring Personal Information Overseas

The Company may transfer users' personal information to Lemon Squeezy, which is headquartered overseas, to process payments for paid services. This is a necessary procedure to provide services, and users must consent to this content when registering as members and making payments for paid services. If they do not consent, the use of paid services may be restricted.

- Items of personal information transferred: Payment method information (card number, expiration date, etc.), transaction information, name, email, address, and other information necessary for payment processing.
- Countries transferred to: The United States and other countries where Lemon Squeezy's servers are located.
- Recipient: Lemon Squeezy, LLC
- Purpose of transfer: Payment and settlement of fees for using paid services.
- Retention and use period: Until membership withdrawal or termination of entrustment contract.

Article 8 (Rights, Obligations, and Methods of Exercise of Users and Legal Representatives)

1. Users' Rights and Methods of Exercise

Users can exercise rights such as viewing, correcting, deleting, and requesting suspension of processing of personal information at any time.

- Viewing and correcting personal information: Can be done in the 'Account Settings' menu in the service.
- Deleting and requesting suspension of processing of personal information: Can be requested through 'Contact Us' on the website or customer center (ruleway.tech@gmail.com).

However, the Company may refuse requests if necessary to comply with obligations stipulated in relevant laws and regulations or if there is a risk of infringing on the rights of third parties.

2. Rights of Legal Representatives and Methods of Exercise

Legal representatives of children under 14 years old can exercise rights such as viewing, correcting, deleting, and requesting suspension of processing of personal information of those children. Requests can be made by submitting documents proving legal representative status, and the Company will process immediately.

3. Users' Obligations

Users must maintain their personal information in the most current state, and responsibility for problems arising from entering inaccurate information belongs to the users. In addition, users must not infringe upon or leak other users' personal information, and if violated, may be subject to penalties according to relevant laws and regulations.

Article 9 (Matters Related to Installation, Operation, and Rejection of Automatic Personal Information Collection Devices (Cookie Policy))

1. Use and Types of Cookies

The Company uses cookies to provide services smoothly and improve user experience. Cookies are divided into '**Essential Cookies**', which are mandatory for service operation, and '**Optional Cookies**', which are collected based on users' selective consent.

1) Essential Cookies

These cookies are absolutely necessary to perform basic website functions and maintain security. They are used for core functions such as member authentication and maintaining login status, and enhancing account security. Essential cookies are mandatory for providing services, so they are automatically activated without separate consent procedures and cannot be disabled in service settings. Essential cookies do not contain any personal information.

2) Optional Cookies (Optional / Analytics Cookies)

These cookies are used for service improvement and statistical analysis purposes, and are only collected and used when users have explicitly consented. The Company may collect the following information through optional cookies.

- Users' service visit and usage behavior (e.g., access frequency, visit time, IP address, etc.)

Collected information is used only as statistical data to improve service performance and provide better user experience.

2. Consent Methods for Optional Cookies

Users can directly choose whether to consent to the collection and use of optional cookies through the cookie notification window displayed when accessing the service for the first time. Even if they do not consent, there will be no restrictions on using the basic functions of the service.

Article 10 (Measures to Ensure Personal Information Safety)

The Company implements the following technical/management/physical measures to process users' personal information safely:

1. Technical Measures

- Personal information encryption: Important information such as passwords is encrypted for storage and management.
- Network security: Network access control using intrusion prevention systems (firewalls), etc.
- Access control: Management and control of access rights to personal information processing systems.
- Encryption when transmitting data through SSL certificates.

2. Management Measures

- Minimizing personal information handlers: Minimizing the number of employees handling personal information and conducting regular training.
- Establishing and implementing internal management plans: Establishing and implementing internal management plans to protect personal information.
- Conducting regular internal audits: Regular inspections to ensure safety related to personal information processing.

3. Physical Measures

- Physical access restrictions: Controlling entry and exit of physical locations where personal information is stored.
- Document security: Access control for documents and auxiliary storage media containing personal information.

Article 11 (Person Responsible for Personal Information Protection and Complaint Handling)

1. Person Responsible for Personal Information Protection

The Company has designated a person responsible for personal information protection as follows to be responsible overall for tasks related to personal information processing, as well as handling user complaints and damage relief related to personal information processing.

- Person responsible for personal information protection
- Name: CHOI JUN HO
- Position: Chief Executive Officer
- Contact: ruleway@bigmouth.vn

2. Complaint Handling and Damage Relief

Users can contact the following agencies if they need to report or consult about personal information violations:

- Personal Data Protection Commission of Vietnam
- Cybersecurity Department of the Ministry of Public Security - Ministry of Public Security of Vietnam

Article 12 (Changes to Privacy Policy for Personal Information)

1. This Privacy Policy for Personal Information takes effect from September 5, 2025.

2. Procedures for Changing Privacy Policy for Personal Information

The Company may change the Privacy Policy for Personal Information according to changes in related laws, policies, and security technologies. When the Privacy Policy for Personal Information is changed, we will notify on the website at least 7 days before the change takes effect. However, in case of significant changes to users' rights, we will notify at least 30 days in advance and, if necessary, will notify each user individually via email.

Article 13 (Sending Advertising Information)

1. Matters Related to Sending Advertising Information

The Company only sends advertising information when it has received prior consent from users. Advertising information sent by the Company may include the following content:

- Information about Company service updates, events, promotional programs.
- Notifications about new legal information and AI feature updates.
- Information about customized legal search services.

2. Withdrawal of Consent to Receive Advertising Information

Users can withdraw consent to receive advertising information at any time. Withdrawal of consent can be done

through the following methods:

- Withdrawal through the opt-out method specified in the advertising information.
- Withdrawal request via email (ruleway.tech@gmail.com).

Supplementary Provisions

This Privacy Policy for Personal Information takes effect from September 5, 2025.

Contact Information:

- Company name: CÔNG TY TNHH BIG MOUTH
- Service name: Ruleway AI Legal Search Service
- Website: <https://www.ruleway.ai>
- Email: ruleway.tech@gmail.com