

Ruleway AI Legal Search Service Privacy Policy

Article 1 (Purpose of Privacy Policy)

CÔNG TY TNHH BIG MOUTH (hereinafter "Company") values the personal information of users in operating the Ruleway AI Legal Search Service (hereinafter "Service") and strives to comply with relevant legislation including Vietnam's Personal Data Protection Decree, E-commerce Law, and Cyber Information Security Law. The Company provides guidance on matters related to the protection of users' personal information through this Privacy Policy, including the items of personal information collected from users, collection and usage purposes, processing and retention periods, and matters regarding provision to third parties.

Article 2 (Items and Methods of Personal Information Collection)

1. Items of Personal Information Collected

① Items collected during membership registration

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

② Items collected when using paid services

- Subscription information: Subscription plan, subscription status, renewal date, suspension records
- Credit usage information: Credit purchase history, usage details, remaining credits
- Payment information is not stored but managed by global payment company Paddle

③ Information generated during service usage

- Service usage records, search records, access logs, IP information, cookies, device information (device identifiers, 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. Personal Information Collection Methods

The Company collects personal information through the following methods:

- Collection through users' active participation such as membership registration, service usage, payments, inquiries, etc.

- Collection through automatic collection tools during service usage (log analysis programs, cookies, etc.)

Article 3 (Collection and Usage Purposes of Personal Information)

The Company uses collected personal information for the following purposes:

1. Service Provision and Contract Fulfillment

- Member management and service provision
- AI legal search service provision
- Legal information provision and multilingual translation services
- User identification and identity verification
- Subscription payment management

2. Paid Service Provision and Payment Processing

- Subscription service provision
- Payment processing and settlement
- Subscription renewal and cancellation processing
- Subscription suspension processing
- Credit management and additional credit provision

3. Service Improvement and Development

- Service usage statistics analysis
- AI model improvement and new service development
- Access frequency analysis and service usage statistics
- Customized legal information provision

4. Marketing and Customer Support

- Event information and participation opportunity provision
- New service and update announcements
- Advertising information provision (with marketing information consent)
- Customer inquiries and complaint handling

5. Legal Compliance

- Fulfilling obligations under relevant laws
- Dispute resolution and civil complaint handling
- Preventing fraudulent use and service security

Article 4 (Personal Information Retention and Usage Period)

1. The Company destroys users' personal information without delay once the collection and usage purposes are achieved. However, the following information is retained for the periods specified below for the stated reasons.

① Information retention reasons according to internal company policies

- Fraudulent usage 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 Information retention reasons according to relevant laws

- Records related to contracts or withdrawal of offers: 5 years (Vietnam E-commerce Law)
- Records related to consumer complaints or dispute handling: 3 years (Vietnam Consumer Rights Protection Law)
- Login records: 3 months (Vietnam Cyber Information Security Law)
- Payment-related records: 5 years (Vietnam relevant laws)

2. Personal Information Validity Period System

The Company separately stores and securely manages personal information of members who have not used the service for 1 year. Personal information stored separately is destroyed after the legal retention period. Users receive notification via email before the personal information validity period expires, and if they continue not to use the service after notification, their account is converted to a dormant account.

Article 5 (Personal Information Destruction Procedures and Methods)

1. Destruction Procedures

The Company destroys personal information without delay when the retention period expires or processing purposes are achieved. The destruction procedures are as follows:

- Information entered by users for membership registration, service applications, etc., is transferred to a separate database after purposes are achieved and stored for a certain period according to internal policies and relevant laws before destruction.
- Personal information transferred to separate databases is not used for purposes other than retention purposes except as required by law.

2. Destruction Methods

The Company securely deletes personal information recorded and stored in electronic file format so that records cannot be reproduced, and destroys personal information recorded and stored in paper documents by shredding or incineration.

Article 6 (Provision of Personal Information to Third Parties)

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

① When users have given prior consent

- Personal information processing tasks are outsourced to external specialized companies for smooth service provision, and detailed information about this is specified in Article 7.

② When required by law enforcement agencies according to legal provisions or for investigation purposes following procedures and methods established by law

2. Withdrawal of Personal Information Provision Consent

Users may withdraw consent for personal information provision at any time. Consent withdrawal is possible through the 'Settings' menu within the service or email reception. However, withdrawal of consent may restrict the use of services that were provided based on provision consent.

Article 7 (Personal Information Processing Entrustment and International Transfer)

1. The Company entrusts personal information processing tasks as follows for service provision and improvement.

Entrusted Company	Entrusted Task Content	Retention and Usage Period
Paddle (Payment processor)	Payment processing and settlement	Until membership withdrawal or entrustment contract termination
Email sending agent	Notification email sending	Until membership withdrawal or entrustment contract termination
Cloud service provider	Server and infrastructure operation	Until membership withdrawal or entrustment contract termination

2. Management of Entrusted Tasks

When entering into entrustment contracts, the Company specifies in contracts and other documents matters such as prohibition of personal information processing beyond the purpose of entrusted task performance, technical and administrative protective measures, restrictions on re-entrustment, management and supervision of entrusted parties, and responsibilities for damages in accordance with Vietnam's Personal Data Protection Decree and other relevant laws, and supervises whether entrusted parties safely process personal information.

3. Changes to Entrusted Companies

If the content of entrusted tasks or entrusted parties change, this will be disclosed without delay through this Privacy Policy.

4. Required Consent for International Transfer of Personal Information

The Company transfers users' personal information to an overseas payment processor (Paddle) for paid service payment processing. This is an essential procedure for service provision, and users must agree to this when registering and paying for paid services. If you do not agree, paid service usage may be restricted.

- Personal information items transferred: Payment method information (card number, expiration date, etc.), transaction information, name, email, address, and other information necessary for payment processing
- Countries of transfer: Ireland, UK, USA, and other countries where Paddle's servers are located
- Recipient (name): Paddle.com Market Ltd.
- Transfer purpose: Payment and settlement for paid service usage fees
- Retention and usage period: Until membership withdrawal or entrustment contract termination

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

1. Users' Rights and Exercise Methods

Users may exercise rights such as personal information access, correction, deletion, and processing suspension at any time.

- Personal information access and correction: Available through the 'Account Settings' menu within the service
- Personal information deletion and processing suspension: Available through Contact Us on the website or customer service (ruleway.tech@gmail.com)

However, the Company may refuse requests when necessary for compliance with obligations under relevant laws or when there is concern about infringing third parties' rights.

2. Legal Representatives' Rights and Exercise Methods

Legal representatives of children under 14 may exercise rights such as access, correction, deletion, and processing suspension regarding the child's personal information. Requests can be made by submitting documents proving legal representation, and the Company processes these without delay.

3. Users' Obligations

Users must maintain their personal information in current status, and users are responsible for problems

arising from inaccurate information input. Additionally, users must not infringe or leak other users' personal information, and violations may result in punishment under relevant laws.

Article 9 (Installation and Operation of Automatic Personal Information Collection Devices and Refusal Thereof (Cookie Policy))

1. Use and Types of Cookies

The Company uses cookies for smooth service provision and user experience improvement. Cookies are divided into '**Essential Cookies**' necessary for service operation and '**Optional Cookies**' collected based on users' selective consent.

1) Essential Cookies

These cookies are essential for performing basic website functions and maintaining security. They are used for core service functions such as member authentication, maintaining login status, and enhancing account security. Essential cookies are automatically activated without separate consent procedures as they are essential for service provision and cannot be deactivated through service settings. Essential cookies do not contain any personal information.

2) Optional / Analytics Cookies

These cookies are used for service improvement and statistical analysis purposes and are collected and utilized only when users explicitly consent. 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 experiences.

2. Consent Method for Optional Cookies

Users can directly choose whether to consent to the collection and use of optional cookies through the cookie notice window displayed when first visiting the service. Even if you do not consent, there are no restrictions on using basic service functions.

Article 10 (Measures to Secure Personal Information Safety)

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

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: Access authority management and access control for personal information processing systems
- Data encryption during transmission through SSL certificates

2. Administrative Measures

- Minimizing personal information handlers: Minimizing employees handling personal information and conducting regular training
- Establishing and implementing internal management plans: Establishing and implementing internal management plans for personal information protection
- Conducting regular self-audits: Regular inspections to secure safety in personal information processing

3. Physical Measures

- Physical access restrictions: Access control to physical locations storing personal information
- Document security: Access control for documents and auxiliary storage media containing personal information

Article 11 (Personal Information Protection Officer and Grievance Handling)

1. Personal Information Protection Officer

The Company designates a Personal Information Protection Officer as follows to take overall responsibility for personal information processing and handle user complaints and damage relief related to personal information processing.

- Personal Information Protection Officer
- Name: CHOI JUN HO
- Position: CEO
- Contact: ruleway@bigmouth.vn

2. Grievance Handling and Damage Relief

Users may contact the following organizations if they need to report or consult about personal information infringement:

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

Article 12 (Changes to Privacy Policy)

1. This Privacy Policy takes effect from August 31, 2025.

2. Privacy Policy Change Procedures

The Company may change the Privacy Policy according to changes in relevant laws, policies, security technologies, etc. When the Privacy Policy is changed, notice will be given through website announcements at least 7 days before the change implementation date. However, for important changes to user rights, notice will be given at least 30 days in advance, and individual notification through email, etc., will be provided when necessary.

Article 13 (Transmission of Advertising Information)

1. Matters Regarding Transmission of Advertising Information

The Company transmits advertising information only with users' prior consent. Advertising information transmitted by the Company may include the following content:

- Company service updates, events, and promotional information
- New legal information and AI feature update announcements
- Customized legal search service information

2. Withdrawal of Consent for Advertising Information Reception

Users may withdraw consent for advertising information reception at any time. Withdrawal of consent for advertising information reception is possible through the following methods:

- Withdrawal through unsubscribe methods indicated in advertising information
- Withdrawal request via email (ruleway.tech@gmail.com)

Supplementary Provisions

This Privacy Policy takes effect from August 31, 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