

# SpeedGrowth AI

## 1. Introduction

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SpeedGrowth AI ("SpeedGrowth") is a conversational AI platform for sales, customer support, and user engagement automation. SpeedGrowth is developed and operated by Elastic Labs Company Limited ("Elastic Labs", "we", "our", or "us"), a company incorporated and headquartered in Vietnam.

Protecting the personal data of our customers, users, and their end-users is a fundamental responsibility. This Privacy & Personal Data Protection Policy ("Policy") describes how Elastic Labs, as the data controller for SpeedGrowth AI, collects, uses, stores, and protects personal data when you use our platform.

This Policy explains:

- What categories of personal data SpeedGrowth collects and processes;
- The purposes for which personal data is processed;
- How personal data is collected;
- Who is authorized to process personal data;
- How customer data are stored and segregated;
- The rights and obligations of data subjects;
- The security measures we apply to protect personal data.

This Policy forms an integral part of our Terms of Service and any service agreements between Elastic Labs and our customers. To follow and protect Personal Data Protection law, Elastic Labs does not rely on implied or automatic consent. Your consent to this Policy must be given actively and explicitly - by checking the consent box presented during account registration - before any personal data is collected or processed.

This Policy may be updated from time to time in accordance with changes in applicable law or our data practices. We will notify registered users of material changes via email and by posting the updated Policy on our website at least 14 days before any changes take effect. We recommend that you review this page periodically.

## 2. Definitions

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In this Policy, the following terms have the meanings set out below:

- Elastic Labs Company Limited refers to the legal entity that develops and operates SpeedGrowth AI, including its affiliates, branches, representative offices, and business locations (if any).
- SpeedGrowth AI (or "SpeedGrowth", "the Platform") refers to the conversational AI software product available at <https://speedgrowth.ai>, developed and operated by Elastic Labs Company Limited.
- Customer refers to any individual or organization that registers, accesses, or uses SpeedGrowth's products or services, or participates in SpeedGrowth programs or events.
- Vietnamese Customer refers to any Customer whose registered business address or primary place of use is within the territory of the Socialist Republic of Vietnam.

- Global Customer refers to any Customer whose registered business address or primary place of use is outside the territory of Vietnam.
- End-User refers to natural persons whose personal data is processed through the SpeedGrowth platform on behalf of a Customer (e.g., the Customer's own customers or contacts).
- Personal Data means any information relating to an identified or identifiable natural person, in the form of symbols, text, numbers, images, audio, or similar formats in an electronic environment — including basic personal data and sensitive personal data/
- Processing of Personal Data means any operation or set of operations performed on personal data, including but not limited to: collection, recording, analysis, verification, storage, modification, disclosure, combination, access, retrieval, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, or destruction.
- Data Controller means Elastic Labs Company Limited, which determines the purposes and means of processing personal data in connection with SpeedGrowth AI.
- Data Processor means any third party that processes personal data on behalf of and under the instruction of Elastic Labs.

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### 3. Categories of Personal Data We Process

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#### 3.1 Basic Personal Data

Depending on the nature and type of your interaction with SpeedGrowth, we may collect and process one or more of the following categories of basic personal data:

- Full name (first name, middle name, and last name);
- Nationality;
- Phone number;
- Email address;
- Job title and employer name;
- Work address and work phone number;
- Account credentials (username; passwords are hashed and never stored in plaintext);
- Subscription and billing details (plan type, billing cycle — payment card data is handled exclusively by third-party PCI-DSS compliant processors);
- Other information that identifies or helps identify a specific individual, as classified under applicable law.

#### 3.2 Sensitive Personal Data

Elastic Labs generally does not require customers to submit sensitive personal data. We ask that you refrain from submitting sensitive personal data unless expressly agreed in writing.

Sensitive personal data includes, but is not limited to:

- Banking login credentials, bank account numbers, card numbers, and financial transaction histories (including securities and insurance activity).
- Health, medical, or biometric data;
- Racial or ethnic origin, political opinions, religious or philosophical beliefs;
- Records of legal violations by an individual;

- Any other category designated as sensitive personal data under Personal Data Protection Law

If sensitive personal data is submitted, you hereby consent to its processing under this Policy. You may withdraw consent at any time as described in Section 10. Elastic Labs does not store payment card or banking credential data — such data is handled solely by our third-party payment processors under their own compliance certifications.

### 3.3 Technical & Usage Data

When you visit our website or use our platform, we automatically collect the following technical data:

- IP address and general geographic location (country or region level);
- Browser type, operating system, and device identifiers;
- Pages visited, features accessed, and time spent on the platform;
- Referring URLs and search queries;
- Log files and error reports;
- Cookie identifiers and similar tracking signals (see Section 11).

### 3.4 AI Interaction Data

As a conversational AI platform, SpeedGrowth processes the following AI-specific data:

- Conversation content between your deployed AI agents and End-Users — used solely to deliver the requested service response via Retrieval-Augmented Generation (RAG) and not used to train or improve any general AI or ML model;
- Customer-uploaded configuration data, training documents, and knowledge bases;
- Agent performance metrics and response quality signals, used for service optimization only.

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## 4. How We Collect Personal Data

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Elastic Labs collects personal data through the following methods, which may be automated or manual, electronic or otherwise:

1. Direct interactions: When you create an account, subscribe to a plan, fill out forms, contact support, complete surveys, or communicate with us by email, phone, live chat, or social media;
2. Platform usage: When you access or use the SpeedGrowth platform, our systems automatically record technical and usage data as described in Section 3.3;
3. Third-party sign-in (OAuth): If you register or log in using Google or another authorized OAuth provider, we receive the personal data that you have authorized that provider to share, consistent with that provider's privacy policy;
4. Data your organization uploads to configure your AI agent (knowledge bases, documents, FAQs), and conversations between End-Users and your deployed AI Agent on your website. For details on how this data is used, see Section 5.
5. Third-party integrations: Data received from integrated tools and platforms you authorize (e.g., CRM systems, messaging platforms);
6. Cookies and tracking technologies: As described in Section 11.

When Clients use SpeedGrowth to process data belonging to their own customers or End-Users ("Client Data"), such processing is governed by the Data Processing Agreement between Elastic Labs and the Client, and not by this Privacy Policy. Elastic Labs processes

Client Data only under the Client's instructions, as a Data Processor. The Client is the Data Controller for their End-Users and is responsible for ensuring lawful basis for that data being processed through SpeedGrowth. If you are an End-User with questions about how your data is handled within a Client's SpeedGrowth deployment, please contact that Client directly.

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## 5. Purposes of Processing Personal Data

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Elastic Labs processes personal data only for specific, explicit, and legitimate purposes. These include:

- Providing, operating, and maintaining SpeedGrowth's platform and service features;
- Authenticating your identity and managing your account;
- Processing payments and managing subscriptions (via third-party processors);
- Communicating with you regarding your account, service updates, security alerts, and support requests;
- Sending marketing communications, promotional offers, and product news — only where you have opted in and subject to your right to withdraw consent at any time;
- Personalizing your experience and improving platform features based on usage analytics;
- Measuring performance and conducting business analytics to develop our services;
- Detecting and preventing fraud, unauthorized access, and violations of our Terms of Service;
- Fulfilling legal obligations and responding to lawful requests from competent state authorities;
- Any other specific purpose for which you have given explicit consent.
- SpeedGrowth does not use your data, your uploaded knowledge base, or your End-Users' conversation content to train, fine-tune, benchmark, or improve any AI or machine learning model — including the underlying models that power SpeedGrowth. All AI responses are generated exclusively through Retrieval-Augmented Generation (RAG), which retrieves information from your defined knowledge base at the time of each request. Your data never modifies or becomes part of any AI model.
- SpeedGrowth processes conversation data in aggregated and anonymized form to generate performance analytics including confidence scores, escalation trends, and question frequency patterns. These analytics are provided to Clients to improve their AI Agent deployments. SpeedGrowth does not analyse individual conversation content independently of the Client's instructions, and does not use conversation data to derive insights beyond those made available to the Client within their own account dashboard.

Elastic Labs will not use your personal data for any purpose beyond those listed above without notifying you and, where required by law, obtaining your prior consent.

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## 6. Who Processes Your Personal Data

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### 6.1 Elastic Labs Internal Personnel

Elastic Labs, as Data Controller, processes personal data through authorized employees and personnel who have been assigned specific data processing responsibilities. All personnel with access to personal data are bound by confidentiality obligations and receive data protection training.

## 6.2 Third-Party Processors

Elastic Labs may share personal data with the following categories of third parties, strictly as necessary and under binding data processing agreements that require them to comply with applicable data protection law:

- Cloud infrastructure providers hosting the SpeedGrowth platform (see Section 7 for the specific providers used for Vietnamese and global data);
- Payment processors — for subscription billing only; Elastic Labs does not receive or store card or banking credential data;
- Customer communication and support tools;
- Analytics and product performance providers;
- Legal counsel, auditors, and compliance consultants bound by professional confidentiality;
- Competent state authorities, courts, arbitration bodies, or enforcement agencies — only as required by applicable law or court order;
- Other third parties expressly authorized by you in writing.

Elastic Labs does not sell personal data to any third party under any circumstances. Sharing is limited to what is strictly necessary for the stated purposes. A current list of our sub-processors is available at: [trust.speedgrowth.ai/subprocessors](https://trust.speedgrowth.ai/subprocessors).

## 7. Data Storage: Vietnamese Customers vs. Global Customers

Elastic Labs takes a deliberate and structured approach to data residency. We physically separate the storage environments used for Vietnamese Customers from those used for Global Customers.

### 7.1 Storage Architecture Overview

Customer Segment	Data Type	Storage Provider	Location	Notes
<b>Vietnamese Customers</b>	Account, profile, subscription data	Self-hosted / Vietnam-based cloud	Vietnam (Ho Chi Minh City region)	Complies with Decree 356 data localization
<b>Vietnamese Customers</b>	AI conversation & knowledge base	Self-hosted / Vietnam-based cloud	Vietnam (Ho Chi Minh City region)	Data never leaves Vietnamese jurisdiction
<b>Vietnamese Customers</b>	Backups & disaster recovery	Vietnam-based cloud provider	Vietnam	Encrypted; retained per Section 8
<b>Global Customers</b>	Account, profile, subscription data	AWS / Supabase	us-east-1 (N. Virginia, USA)	Encrypted at rest and in transit

Customer Segment	Data Type	Storage Provider	Location	Notes
<b>Global Customers</b>	AI conversation & knowledge base	AWS / Vercel / Supabase	us-east-1 (N. Virginia, USA)	RAG-only; no model training
<b>Global Customers</b>	Backups & disaster recovery	AWS S3	us-east-1 (N. Virginia, USA)	AES-256 encrypted; geo-redundant

## 7.2 Vietnamese Customer Data — Localization Commitment

All personal data belonging to Vietnamese Customers — including account information, AI conversation content, uploaded knowledge bases, and backups — is stored exclusively within the territory of Vietnam. Elastic Labs does not transfer Vietnamese Customer data outside Vietnam except:

- Where explicitly requested and authorized in writing by the Customer;
- Where required by a competent Vietnamese authority under applicable law;
- Where strictly necessary to provide a specific cross-border service feature explicitly opted into by the Customer, in which case a Data Transfer Impact Assessment (DPIA) is completed and filed with the Department of Cybersecurity and Hi-Tech Crime Prevention (A05) within 60 days, as required by Decree 356/2025/NĐ-CP.

Elastic Labs maintains separate database clusters, storage buckets, and access control environments for Vietnamese Customer data, with logical and physical separation from global infrastructure.

## 7.3 Global Customer Data — International Standards

Personal data belonging to Global Customers is stored on AWS infrastructure in the us-east-1 (N. Virginia, USA) region, managed via Supabase and Vercel. Elastic Labs applies the following protections for global data:

- All data is encrypted at rest (AES-256) and in transit (TLS 1.2+);
- Access is restricted by role-based access controls and audit logging;
- Data is processed only for the purposes set out in this Policy;
- No AI training on customer data — conversation content is used solely within your RAG scope;
- Sub-processors are bound by data processing agreements with security and confidentiality obligations consistent with internationally recognized standards.

Elastic Labs applies reasonable and appropriate privacy protections to all Global Customers, in accordance with the laws applicable to our operations. Global Customers who are subject to specific data protection regulations in their own jurisdiction (e.g., sector-specific rules) are responsible for ensuring their own compliance when using SpeedGrowth.

# 8. Data Storage and Retention

## 8.1 Retention Period

Personal data is retained for as long as necessary to fulfill the purposes for which it was collected, consistent with your agreement with us and applicable law:

- Account and service data: retained for the duration of your active subscription, plus a reasonable period thereafter as required to meet legal obligations, prevent fraud, or resolve disputes;
- AI conversation and interaction data: retained per the configurable data retention settings available in your account dashboard;
- Marketing and prospect data: retained until no longer commercially relevant, or until you withdraw consent;
- Legal, tax, and compliance records: retained for the periods mandated by Vietnamese law and any applicable international regulations.

Elastic Labs does not retain personal data beyond what is necessary for the stated purposes.

## 8.2 Deletion on Request

Upon your verified erasure request (see Section 9), Elastic Labs will delete or anonymize your personal data within 2 working days of confirming your identity, except where:

- Retention is required by law (e.g., tax, audit, or regulatory records);
- Retention is necessary to prevent fraud or protect Elastic Labs' legal interests;
- Retention is required to fulfill obligations to competent state authorities.

Elastic Labs may retain certain records after account closure for these purposes, in compliance with applicable law.

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## 9. Your Rights as a Data Subject

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Depending upon your location and in accordance with applicable laws, you may have the right to:

### 9.1 Right to Be Informed

You have the right to receive clear, transparent information about how your personal data is collected, processed, and used. This Policy constitutes that notice.

### 9.2 Right of Access

You may request confirmation of whether Elastic Labs holds personal data about you, and request access to that data. Elastic Labs will respond within 2 business days of receipt of a verified request.

### 9.3 Right to Rectification

You may request correction of inaccurate or incomplete personal data held about you. Elastic Labs will process verified rectification requests within 2 business days.

### 9.4 Right to Erasure

You may request the deletion of your personal data. Elastic Labs will process verified erasure requests within 72 hours. Erasure may not apply where law requires us to retain the data.

### 9.5 Right to Restrict Processing

You may request that Elastic Labs restrict processing of your personal data in certain circumstances. Restrictions will be implemented within 72 hours of a verified request, unless law provides otherwise.

## 9.6 Right to Data Portability

Where technically feasible, you may request your personal data in a structured, commonly used, machine-readable format. Elastic Labs will communicate the format, timeline, and delivery method within 72 hours of a valid request.

## 9.7 Right to Object

You may object to Elastic Labs' processing of your personal data for direct marketing, profiling, or other purposes not strictly necessary to provide the service. Valid objections will be honored within 2 business days.

## 9.8 Right to Withdraw Consent

Where processing is based on your consent, you may withdraw that consent at any time without penalty. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

## 9.9 Right to Self-Protection

You have the right to self-protect in accordance with the Vietnamese Civil Code, including the right to demand cessation of infringing conduct, public correction, and compensation for harm, consistent with Article 11 of the Civil Code.

## How to Exercise Your Rights

To exercise any of the rights above, please contact us via:

- Email: [speedgrowth.support@elasticlabs.org](mailto:speedgrowth.support@elasticlabs.org)

We may require identity verification before processing your request. All valid requests will be handled at no cost to you within the timeframes specified above.

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# 10. Consent and Withdrawal of Consent

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## 10.1 How We Obtain Consent

Elastic Labs processes personal data only with your prior, verifiable consent, except where otherwise permitted by law. Consent is obtained in a manner that is verifiable and auditable — recording the identity of the data subject, the time of consent, and the specific content consented to. Consent is never implied, pre-ticked, or bundled with other agreements without a clear, distinct opt-in action.

Consent is obtained when you:

- Actively check the box confirming: "I have read, understood, and agree to SpeedGrowth's Terms of Service and Privacy Policy" when creating an account or initiating a subscription; or
- Sign a written service agreement that expressly incorporates this Policy.

## 10.2 Withdrawing Consent

You may withdraw consent at any time by submitting a written request to [speedgrowth.support@elasticlabs.org](mailto:speedgrowth.support@elasticlabs.org). Upon receiving your withdrawal:

- Elastic Labs will notify you of any service impacts resulting from withdrawal;
- Elastic Labs will cease processing the relevant personal data and instruct any relevant sub-processors to do likewise;

- Withdrawal does not affect the lawfulness of processing carried out prior to withdrawal.

### 10.3 Processing Without Consent

Elastic Labs may process personal data without prior consent only in the circumstances permitted by the Personal Data Protection Law No. 91/2025/QH15, including:

- Emergency situations requiring immediate processing to protect the life or health of the data subject or another person;
- Mandatory disclosure required by applicable Vietnamese law;
- Processing by competent state authorities in the context of national security, disaster, pandemic, or law enforcement;
- Performance of a contract to which you are a party;
- Compliance with legal obligations imposed on Elastic Labs.

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## 11. Cookies and Tracking Technologies

SpeedGrowth uses cookies and similar technologies (including pixels, web beacons, and session storage) on its website and platform to:

- Enable essential platform functionality and maintain your authenticated session;
- Remember your preferences and settings across visits;
- Analyze platform usage and improve performance and user experience;
- Deliver relevant service communications (where consent is given).

When you first visit our website, you will be presented with a cookie consent banner. Non-essential cookies are not placed without your explicit prior consent. You may manage, change, or withdraw cookie consent at any time via the Cookie Preferences tool in our website footer, or by adjusting your browser or device settings.

Disabling essential cookies may impair the functionality of the SpeedGrowth platform. A full Cookie Policy is available at: <https://speedgrowth.ai/legal/cookie-policy>.

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## 12. Data Security and Protection Measures

Elastic Labs implements comprehensive technical, organizational, and administrative safeguards to protect personal data against unauthorized access, loss, destruction, alteration, or disclosure:

- **All customer data is encrypted at rest using AES-256 and in transit using TLS 1.2 or higher.** Encryption:
- **Role-based access controls ensure that only personnel with a documented need can access personal data. Access events are logged and subject to periodic audit.** Access Control:
- **Vietnamese Customer data is hosted on Vietnam-based infrastructure. Global Customer data runs on AWS (us-east-1), managed via Supabase and Vercel, with security hardening and continuous monitoring.** Infrastructure Security:
- **Elastic Labs does not use personal data — or End-User conversation content — to train, fine-tune, or benchmark general AI or ML models. AI responses are generated exclusively via Retrieval-Augmented Generation (RAG) within the scope of your defined knowledge base.** No AI Training on Customer Data:

- **All API endpoints and AI agent interactions are protected by rate limiting to prevent abuse and unauthorized automated access.** Rate Limiting & Abuse Prevention:
- **Elastic Labs has designated a DPO in accordance with Decree 356/2025/NĐ-CP to oversee our data protection program, monitor compliance, and serve as the point of contact for data subjects and regulators.** Data Protection Officer (DPO):
- **In the event of a personal data breach, Elastic Labs will notify the competent authority (A05) and affected data subjects within the timeframe required by law (not to exceed 72 hours where mandated), and will take immediate steps to contain, investigate, and remediate the incident.** Breach Notification:

While Elastic Labs employs strong safeguards, no system is completely immune to external threats. Elastic Labs is not liable for unauthorized access resulting from actions taken by you (e.g., sharing your credentials with a third party). If you suspect any misuse of your account or credentials, please contact us immediately at [privacy@speedgrowth.ai](mailto:privacy@speedgrowth.ai).

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### 13. AI-Specific Data Provisions

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Given SpeedGrowth's nature as an AI platform, the following additional data commitments apply:

- **No General AI Training:** Elastic Labs will never use Customer data or End-User conversation content to train, benchmark, evaluate, or improve any general-purpose AI or ML model, including any foundational large language model used to power SpeedGrowth.
  - **RAG Architecture:** SpeedGrowth uses Retrieval-Augmented Generation (RAG) to enable AI agents to respond using your uploaded knowledge base. Your data is retrieved contextually at inference time and is never incorporated into or used to modify the underlying AI model.
  - **Google Workspace APIs:** Any data accessed through Google Workspace APIs is used solely to deliver the specific functionality you requested and is not used for AI model development, improvement, or evaluation.
  - **AI Systems Compliance (Decree 356/2025):** Where SpeedGrowth processes personal data within AI systems as defined in Chapter II of Decree 356/2025/NĐ-CP, Elastic Labs complies with all applicable sector-specific data protection requirements for AI platforms, including data minimization, purpose limitation, and auditability of AI decisions.
  - **Cloud Processing Compliance:** Where cloud computing infrastructure is used for data storage or processing, Elastic Labs applies the specific data protection measures required for cloud environments under Decree 356/2025/NĐ-CP, including encryption, access controls, and contractual obligations with cloud providers.
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### 14. Age Restriction

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SpeedGrowth's services are intended solely for users aged 18 and above. Elastic Labs does not knowingly collect or solicit personal data from individuals under the age of 18. If a minor under the age of 18 wishes to use SpeedGrowth's services, verifiable consent from a legal guardian is required before account creation or any use of the platform.

If Elastic Labs becomes aware that it has collected personal data from a minor without appropriate guardian consent, it will delete such data promptly. If you have reason to believe

that we may have collected data from a minor, please contact us immediately at [privacy@speedgrowth.ai](mailto:privacy@speedgrowth.ai).

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## 15. Customer Obligations Regarding End-User Data

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If you upload or transmit personal data of your End-Users to the SpeedGrowth platform, you represent and warrant that:

- You have obtained all necessary prior consents and have a lawful basis under applicable law to provide such data to Elastic Labs for processing;
- You have informed your End-Users that their data may be processed by SpeedGrowth AI under this Policy;
- The data you provide is accurate, complete, and current;
- You will promptly notify Elastic Labs of any withdrawal of consent by an End-User so that we may cease processing their data without delay;
- You comply with all data protection laws applicable to your collection and use of End-User data in your own jurisdiction.

Elastic Labs has no direct contractual relationship with End-Users. If an End-User wishes to exercise their data subject rights over data processed through your SpeedGrowth deployment, they must contact you directly. You are responsible for facilitating any such requests with Elastic Labs' cooperation.

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## 16. Consequences of Not Providing Personal Data

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If you decline to provide, provide inaccurate, or provide incomplete personal data to Elastic Labs, or if you withdraw or restrict your consent, this may result in one or more of the following:

- The relevant processing purpose may not be fully fulfilled;
- Provision of the SpeedGrowth service may be interrupted, limited, suspended, or terminated;
- Such action may be treated as a unilateral termination of the service relationship by you, potentially constituting a breach of your obligations under our Terms of Service.

Elastic Labs will not be liable to you for any losses arising from limitations or terminations resulting from your refusal to provide, or withdrawal of consent for, the processing of necessary personal data.

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## 17. Changes to This Policy

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Elastic Labs reserves the right to update this Policy at any time to reflect changes in applicable law, regulatory guidance, or our data practices. We will notify registered Customers of material changes via email and by posting the updated Policy on our website at least 14 days before the changes take effect.

We encourage you to review this Policy periodically. Continued use of SpeedGrowth's services following notification of changes constitutes acceptance of the updated Policy. The current version is always available at: <https://speedgrowth.ai/legal/privacy>.

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## 18. Contact Information

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To exercise your rights, submit data protection inquiries, or raise concerns about the processing of your personal data, please contact:

<b>Legal Entity</b>	Elastic Labs Company Limited
<b>Product</b>	SpeedGrowth
<b>Website</b>	<a href="https://speedgrowth.ai">https://speedgrowth.ai</a>
<b>Privacy Email</b>	<a href="mailto:speedgrowth.support@elasticlabs.org">speedgrowth.support@elasticlabs.org</a>
<b>Privacy Request Portal</b>	<a href="https://speedgrowth.ai/privacy-request">https://speedgrowth.ai/privacy-request</a>
<b>DPO Contact</b>	<a href="mailto:speedgrowth.support@elasticlabs.org">speedgrowth.support@elasticlabs.org</a>
<b>Support Hours</b>	Monday – Friday, 09:00 – 18:00 (GMT+7, Vietnam)

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