

PRIVACY POLICY

ALEX BRIDGES AI Chatbot

Last updated: April 07, 2026

Effective date: March 15, 2026

Alliance Regulatory Limited ("we", "us", "our") operates the Alex Bridges AI chatbot ("Alex Bridges", "the Service"), an AI-powered tool providing information and guidance on EU regulatory topics (REACH, BPR, PPP, biocides, chemicals).

We are committed to protecting your privacy and handling personal data responsibly in accordance with the EU General Data Protection Regulation (GDPR; Regulation (EU) 2016/679), the ePrivacy Directive (where applicable for cookies / tracking), and the EU Artificial Intelligence Act (Regulation (EU) 2024/1689) transparency requirements for limited-risk AI systems.

Scope and global application

This Privacy Policy is primarily designed to comply with EU data protection laws (GDPR) and the EU AI Act (transparency rules applicable from 2 August 2026 for users in the EU or outputs used in the EU). We apply similar high standards of data protection globally as a matter of best practice, including minimal data collection, short retention periods, strong security, and no selling of personal data.

For users located outside the EU/EEA (including in China under the Personal Information Protection Law, PIPL, or other jurisdictions), EU-specific obligations (such as certain consent mechanisms or GDPR rights) apply only if your data is processed in connection with an EU location. However, you can still contact us at contact@allianceregulatory.com for data access, deletion, or other requests, we handle them reasonably under applicable laws.

1. Who we are

Data controller: Alliance Regulatory Limited
2301, 23/F, Bayfield Building,
99 Hennessy Road, Wan Chai,
Hong Kong
For privacy questions: contact@allianceregulatory.com

2. What personal data we collect and why

We collect only the minimum data necessary to operate the Service securely and effectively.

- Automatically collected (essential for operation and security, processed primarily in the EEA):
 - IP address (anonymised / truncated immediately, last octet removed or hashed).
 - Device type / browser information.
 - Approximate location (country / region derived from anonymized IP).
 - Timestamp and metadata of interactions.
 - Full user queries / messages and AI-generated responses (chat content).

Purposes: Abuse prevention, security (fraud / spam detection), service availability, basic analytics (aggregate usage trends), freemium enforcement (query limits).

Legal basis: Legitimate interests (Art. 6(1)(f) GDPR) - balanced against your rights; essential for security and proper functioning.

- Chat content (queries and responses): Provide answers, improve response quality (limited manual review of last 100 - 200 anonymised interactions), debug issues. Contractual necessity (Art. 6(1)(b) GDPR) to deliver the Service; legitimate interests for quality improvement.
- Freemium tracking (if enabled): Anonymous user identifier (via device fingerprint, localStorage, or cookie) for monthly query count (5 free queries).
Purposes: Enforce free-tier limits.
Legal basis: Consent (required for non-essential tracking under ePrivacy/GDPR; via banner); legitimate interests as fallback for truly essential elements. For users outside the EU, handled under local laws or legitimate interests without mandatory EU-style consent.
- For users outside the EU, freemium tracking and other processing rely on our legitimate interests or local applicable laws, without mandatory EU-style consent where not required.

We do not collect names, emails, or other direct identifiers unless you voluntarily provide them (in a query or optional sign-up). We do not use chat content to train or fine-tune AI models without your separate explicit consent.

3. EU AI Act transparency information

Alex Bridges is a limited-risk generative AI system under the EU AI Act.

We provide the following transparency information in line with EU AI Act requirements (applicable for interactions in the EU or outputs used in the EU). Similar clear disclosures about AI-generated content apply globally to promote trust and accuracy.

The following transparency information is provided in line with EU AI Act requirements (applicable when interacting with users in the EU or when outputs are used in the EU). We apply similar clear disclosures globally for trust and accuracy.

- You are interacting with an AI system (powered by Qwen model via Dify), not a human.
- All responses are AI-generated and may exceptionally contain inaccuracies or hallucinations - always verify with official EU / national sources (ECHA, EFSA, ANSES, etc.).
- Outputs are not intended as formal legal / regulatory advice; they are informational only. Where relevant (regulatory / professional guidance), outputs may be marked as AI-generated (via suffixes or notes).
- We do not engage in emotion recognition, biometric categorization, deepfakes, or high-risk processing.

4. How long we keep your data

- Chat logs and metadata: Maximum 60 to 90 days (auto-deleted unless needed for legal / security reasons).
- Anonymized aggregate stats: Up to 2 years for service improvement.
- IP / device fingerprints for freemium: Only during active session + 24h reset period.

5. Who we share data with

We do not sell or share personal data for marketing / advertising.

- Processors (under GDPR Art. 28 Data Processing Agreements, DPAs): Hosting providers, Dify platform (for knowledge base and inference), local infrastructure (with EU data residency where possible), payment processor (Stripe). All bound by strict contracts.
- Legal requirements: If compelled by law, court order, or to protect rights / safety.

No transfers of personal data outside the EEA occur except as described in the 'Data location and international transfers' section above and are always covered by appropriate safeguards such as Standard Contractual Clauses (SCCs).

Our primary infrastructure and data processing are located in the European Economic Area (EEA). This means that, in normal operation, personal data (including chat content and metadata) is stored and processed within the EEA. For service resilience and redundancy, we may in the future replicate limited data in Hong Kong. Any such transfer to Hong Kong will be protected by appropriate safeguards, including the European Commission's Standard Contractual Clauses (SCCs) together with technical and organisational measures. We do not routinely transfer personal data outside the EEA except where necessary for the

purposes set out in this policy.

6. Your rights

The rights listed below apply fully under GDPR to individuals located in the EU / EEA whose data we process under its scope. For users in other jurisdictions (China under PIPL, US states with privacy laws, Brazil LGPD, India DPDP), equivalent or similar rights may exist under local laws. Contact us at contact@allianceregulatory.com - we will respond to reasonable requests for access, deletion, correction, or other concerns within one month (extendable if complex).

You have the right to:

- Access your data
- Rectify inaccurate data
- Erase data ("right to be forgotten")
- Restrict processing
- Object to processing (especially legitimate interests)
- Data portability
- Withdraw consent (where applicable)
- Lodge a complaint with your national supervisory authority (CNIL in France: cnil.fr).

7. Security of your data

We implement appropriate technical and organizational measures:

- HTTPS encryption in transit.
- Logs encrypted at rest.
- Access controls on dashboard / backend.
- Anonymization / pseudonymization where possible.
- Regular security reviews.

8. Cookies and tracking technologies

- Essential cookies: For core functionality (session, freemium counter). No consent required.
- Non-essential (analytics / tracking): Only with your consent via banner.
- Consent banner: Appears on first visit; choices stored in localStorage / cookie. You can withdraw anytime via footer link.

9. Children's privacy

The Service is not directed at children under 16. We do not knowingly collect data from children.

10. Changes to this policy

We may update this policy. Changes will be posted here with updated effective date. Significant changes notified via in-chat notice or email (if you provided one).

11. Contact us

For privacy questions: contact@allianceregulatory.com

By using Alex Bridges, you acknowledge this Privacy Policy. Thank you for trusting us with your queries.