

Electronic Evidence in Dispute Resolution at Commercial Arbitration in Vietnam: Practice and Challenges in the Digital Era

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ABSTRACT: Vietnam, as well as other countries, is benefiting from significant achievements enabled by new technology, while also facing legal challenges related to its use and adoption. With the expansion of the Internet, opportunities for business and commercial activities are increasingly visible due to its borderlessness, speed, and high processing power. This also gives rise to disputes related to business and commercial activities through electronic transactions, in which the disputing parties are required to provide evidence to protect their legitimate rights and interests. Along with the growing circulation of electronic documents in trade, electronic evidence has also become especially important in business dispute resolution procedures in commercial arbitration. The article focuses on the issue of accepting electronic evidence in business and commercial dispute resolution procedures, highlighting the limitations and inadequacies of current legal regulations and proposing suggestions for improving legal regulations on the acceptance of electronic evidence in business dispute resolution procedures at commercial arbitration in Vietnam.

KEYWORDS: Commercial arbitration, dispute resolution, electronic evidence, legal admissibility, Vietnam.

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Introduction

In recent decades, the rapid expansion of globalisation, international trade, and digital technologies has fundamentally reshaped the way commercial transactions are conducted. Cross-border e-commerce, online platforms, and digitalised business models have increased the complexity of contractual relationships, giving rise to a new generation of disputes in which electronic documents and data often serve as the core source of evidence (Mason and Seng 2017). Against this background, arbitration has emerged as the most popular mechanism for resolving international and domestic commercial disputes, offering neutrality, procedural flexibility, efficiency, and enforceability under international conventions such as the 1958 New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards (United Nations, 1958). Unlike traditional court litigation, arbitration allows parties to choose arbitrators with expertise in technology, commerce, and law, while preserving confidentiality and reducing the risk of politicisation (Born, 2021).

However, arbitration proceedings are not entirely insulated from judicial scrutiny. Under the Civil Procedure Code (CPC) 2015 (Civil Procedure Code, 2015) and the Law on Commercial Arbitration (LCA) 2010 (Law on Commercial Arbitration, 2010), arbitral awards are subject to annulment by Vietnamese courts if they are deemed inconsistent with the *fundamental principles of Vietnamese law* (Law on Commercial Arbitration, 2010). Resolution No. 01/2014/NQ-HĐTP further details the circumstances under which arbitral awards may be set aside, including violations of procedural safeguards or reliance on inadmissible evidence (Guiding the Implementation of Certain Provisions of the Law on Commercial Arbitration 2014). This interplay between arbitrating discretion and judicial review gives rise to significant uncertainty in practice, particularly when disputes hinge on electronic evidence, which may include emails, messaging logs, system metadata, blockchain records, or audiovisual files (Nguyen Thanh Minh Chanh, 2021).

Electronic evidence raises unique challenges for arbitral tribunals and courts alike. Unlike traditional paper-based evidence, electronic records may be intangible, easily altered, or stored on servers outside Vietnam's jurisdiction (Law on Commercial Arbitration, 2010). Questions of authenticity, integrity, reliability, and admissibility become central to determining whether such evidence can be relied upon. The arbitral tribunal, pursuant to Articles 46 and 47 of the LCA, is empowered to determine the admissibility and weight of evidence (Law on Commercial Arbitration, 2010). However, courts retain the authority to annul awards if they conclude that reliance on electronic evidence contravened procedural safeguards under the Civil Procedure Code 2015. This duality often produces tension: arbitral tribunals may adopt a pragmatic and flexible approach, while courts emphasise formalistic compliance, sometimes requiring the "original" version of documents in physical form, a requirement difficult to satisfy in the digital era (Tuong Duy Luong, 2023).

This problem is not unique to Vietnam. International practice has long debated the admissibility of electronic evidence in arbitration. The UNCITRAL Model Law on International Commercial

Arbitration (1985/2006) recognises the principle of procedural flexibility, granting tribunals wide discretion in determining evidentiary issues (UNCITRAL, 2006). The UNCITRAL Model Law on Electronic Commerce (1996) and Model Law on Electronic Signatures (2001) explicitly acknowledge the functional equivalence of electronic records with traditional documents, provided authenticity and reliability are assured. Likewise, the IBA Rules on the Taking of Evidence in International Arbitration (2020) emphasise that tribunals may admit electronic documents, metadata, or electronic recordings and assess their probative value in accordance with international best practices (International Bar Association, 2020). Similarly, it reflects a flexible evidentiary regime that enables tribunals to determine the relevance, materiality, and admissibility of electronic records (International Chamber of Commerce (ICC), 2021).

Comparative experiences further illustrate this evolving trend. In the United States, the Federal Rules of Evidence 902(13) and 902(14) provide mechanisms for the self-authentication of electronic records, reducing the burden on parties to produce witnesses to prove authenticity (Federal Rules of Evidence, 2024). In the European Union, the eIDAS Regulation (No. 910/2014) establishes a harmonised legal framework for electronic identification, trust services, and electronic signatures, ensuring the legal validity of digital documents across member states (Official Journal of the European Union, 2014). Singapore, a leading arbitration hub in Asia, has incorporated provisions into its Evidence Act to recognise the evidentiary status of electronic records, emphasising reliability and system integrity (Singapore Parliament, 1983). These comparative practices demonstrate a global shift toward recognising the unique nature of electronic evidence while maintaining safeguards for authenticity and integrity.

In Vietnam, despite significant progress under the Law on Electronic Transactions 2023, which establishes the principle of legal equivalence between electronic data messages and paper-based documents, if data messages are accessible, reliable, and capable of authentication. Yet, gaps remain in harmonising these principles with the Civil Procedure Code and the Law on Commercial Arbitration (Duong Hoai An, 2025). The absence of clear procedural standards for handling, authenticating, and preserving electronic evidence leads to inconsistent practices, undermining confidence in arbitral proceedings.

The implications are profound. If courts frequently annul arbitral awards on grounds of insufficient evidentiary reliability, it will undermine arbitration's attractiveness as an effective dispute-resolution mechanism in Vietnam. This undermines not only the autonomy of arbitral tribunals but also Vietnam's standing as a reliable arbitration venue for international investors and commercial actors (Manh et al., 2024). Strengthening the legal framework governing electronic evidence is therefore essential, not only to ensure fairness and efficiency in arbitration but also to foster confidence in Vietnam's judicial and arbitral systems in the digital economy.

Against this backdrop, this article addresses the admissibility of electronic evidence in resolving commercial disputes through arbitration in Vietnam. It seeks to answer the following research question:

To what extent does the court's supervisory power to annul arbitral awards constrain the discretion of arbitral tribunals in admitting and assessing electronic evidence? By examining both domestic legislation and international standards, the article identifies the limitations and inadequacies of Vietnam's current framework, evaluates the interaction between arbitral discretion and judicial oversight, and proposes recommendations to align Vietnam's practice with international best practices. The aim is to enhance the efficiency, predictability, and credibility of arbitration in Vietnam in the age of digital commerce.

Research Aim

This study aims to critically examine the coherence of Vietnamese legal regulations on the admissibility of electronic evidence in commercial arbitration, with particular attention to the divergence between arbitral tribunals' evidentiary discretion and courts' judicial review of arbitral awards. By analysing statutory provisions, judicial practice, and arbitral decisions, the research seeks to identify the causes of inconsistent approaches to electronic evidence, especially regarding representative authority and procedural formalities. On that basis, the study proposes legal reforms aligned with international standards to enhance legal certainty, predictability, and confidence in commercial arbitration in Vietnam.

Research Questions

1. To what extent does Vietnamese law provide a coherent framework for the admissibility of electronic evidence in commercial arbitration, particularly in light of judicial review of arbitral awards?
2. Why do divergences arise between arbitral tribunals and Vietnamese courts in the assessment of electronic evidence, especially concerning representative authority and procedural formalities?
3. What legal reforms are required to harmonise Vietnamese arbitration practice on electronic evidence with international standards and enhance legal certainty in commercial dispute resolution?

Results and Discussion

The admissibility of evidence, in general and, in arbitration proceedings, in particular, is subject to differing approaches among arbitral tribunals and courts. While arbitral tribunals enjoy broad discretion under Articles. 46-47, the Law on Commercial Arbitration 2010, the courts, when reviewing arbitral awards under Articles. 93-96, the Civil Procedure Code 2015 and Resolution No. 01/2014/NQ-HĐTP, may annul an award if they find that the evidentiary assessment contravenes fundamental legal principles (Guiding the Implementation of Certain Provisions of Law on Commercial Arbitration 2014). This divergence often leads to inconsistencies in the recognition of electronic evidence.

First, regarding the subject of establishing transactions in contractual relationships.

In a dispute over a goods-processing contract between D. Joint Stock Company and M. Vietnam Co., Ltd. (2018), both parties acknowledged email correspondence as evidence (*Dispute over commercial business contract for processing goods, Judgment No. 08/2018/KDTM-PT, 2018*). The defendant argued that the emails were invalid because they were sent by Mr Hoang Van C., who was not the legal representative of Company D. The Court nevertheless held that Mr C. was regularly assigned to handle contractual matters and debt monitoring, and that his emails were simultaneously copied to Company D's leaders. Thus, the Court accepted these emails as evidence of transactions, despite Mr C.'s lack of formal representative authority (Nguyen Thanh Minh Chanh, 2021).

Conversely, in another case (BG Vietnam Co., Ltd. v. BG Co., Ltd., 2019), the Court annulled an arbitral award, ruling that the signatory of the contract was not the company's legal representative and lacked proper authorization under the company charter or registration certificate (*Dispute over goods purchase contract of, Judgment No. 20/2019/KDTM-PT 2019*). Here, the Court emphasised that a managerial position alone could not substitute for representative authority, citing Civil Code 2015, Article 117, on the conditions for valid civil transactions (Civil Procedure Code, 2015). These cases demonstrate divergent judicial views on whether unauthorised acts in electronic communications may still constitute valid contractual representation.

Second, legal obstacles related to the form of electronic evidence

Vietnamese law does not provide detailed procedural rules for verifying electronic evidence in civil and arbitral proceedings, resulting in inconsistent outcomes. For instance, in a commercial dispute between CN B. Co., Ltd. and DN. Commodity Production & Enterprise Co., Ltd. (2019), the defendant submitted invoices transmitted by email as evidence (*Dispute over goods purchase contract of, Judgment No. 20/2019/KDTM-PT 2019*)e. The Court rejected them because they were in a foreign language without Vietnamese translation, were unauthenticated under Civil Procedure Code 2015, Article 96(3) (Civil Procedure Code, 2015), and lacked identification of the sender. Similarly, in the dispute between the plaintiff Tai Seng Bavet Sez Co., Ltd. and the defendant Chunghwa Telecom Vietnam Co., Ltd., (Request to set aside the arbitration award- Decision No. 1768/2022/QD-PQTT 2020). The Court annulled the award because the arbitral tribunal admitted foreign documents without consular legalisation, holding that this contravened Vietnamese procedural law and Decree No. 111/2011/ND-CP on consular certification and legalisation (Government, 2011).

By contrast, arbitral tribunals may admit electronic evidence more flexibly.

Articles 46 and 47 of the Law on Commercial Arbitration 2010 allow tribunals to consider electronic data as written or physical evidence without strict adherence to civil procedural requirements (Tran, 2022). However, this flexibility carries the risk of annulment by courts, which often insist on

compliance with formal procedural safeguards, such as consular legalisation, certified translations, and submission of originals.

This tension raises a critical question: whether arbitral tribunals' discretion in admitting electronic evidence is undermined by courts' supervisory powers, thereby affecting the predictability of arbitration in Vietnam. The lack of clear statutory criteria for the admission of electronic evidence in arbitration underscores the urgent need for harmonisation between arbitral practice and judicial review to enhance consistency and legal certainty.

In a comparative perspective, Vietnam's approach, where courts emphasise compliance with formal procedural requirements (translation, authentication, and consular legalisation), contrasts with several international systems that adopt a more flexible framework. In the United States, for instance, the landmark case *Lorraine v. Markel American Insurance Co.* (2007) (Lorraine & Mack, 2007) underscored that electronic evidence, including emails and digital records, must satisfy the traditional tests of relevance, authenticity, hearsay exceptions, originality, and probative value under the Federal Rules of Evidence (Lorraine & Mack, 2007). Judge Grimm's opinion in this case is widely regarded as a guideline for assessing the admissibility of electronic evidence.

Similarly, the IBA Rules on the Taking of Evidence in International Arbitration explicitly recognise electronic documents as admissible evidence and emphasise authenticity and integrity over rigid formalities such as legalisation (International Bar Association, 2020). Moreover, both the International Chamber of Commerce (ICC, 2021) and the SIAC Rules (2016) grant arbitral tribunals broad discretion to admit and evaluate evidence, without distinguishing between paper and electronic formats. In practice, tribunals under these rules routinely accept electronic records such as emails, metadata, and system-generated files, provided their source and reliability can be demonstrated.

This comparative insight reveals a fundamental divergence: while international arbitration focuses on practical reliability and authenticity, Vietnamese practice remains tied to formal procedural safeguards under the Civil Procedure Code. As a result, arbitral awards in Vietnam are more vulnerable to annulment when based on electronic evidence that does not strictly comply with procedural formalities, even if its authenticity is not in doubt. This highlights the need for Vietnam to modernise its evidentiary rules to align with global best practices, thereby enhancing the efficiency and credibility of commercial arbitration.

Recommendations for Legal Reform

The admissibility of electronic evidence is inherently more complex than traditional evidence because of its technical characteristics. Unlike conventional documents or physical objects, electronic evidence often requires specialised expertise to evaluate its authenticity, reliability, and probative value (Mason and Seng 2017). Judges and arbitrators are therefore not only tasked with legal interpretation. Still, they must also be equipped with at least a fundamental understanding of information technology

or supported by technical experts to properly assess electronic data (Stanfield, 2016). This dual requirement highlights the need for a legal framework that is both technologically adaptive and procedurally sound.

Comprehensive research on theoretical and practical issues concerning electronic evidence in business dispute resolution through commercial arbitration is critical. Such studies contribute to clarifying the legal nature of electronic evidence, identifying gaps in the current Vietnamese legal system, and aligning domestic law with international practice (Nguyen Thanh Minh Chanh, 2021). The law must evolve in step with rapid technological developments to ensure that arbitral tribunals and courts can deliver fair and consistent decisions based on admissible evidence.

First, because electronic evidence is technical in nature, procedures for collecting, preserving, and evaluating it must be continually updated. Different devices and software generate different forms of data, which require tailored technical procedures to ensure accuracy and integrity (Nguyen Thanh Minh Chanh, 2021). Arbitrators should be empowered to appoint IT experts or digital forensic specialists to verify the authenticity and completeness of electronic records (Committee of Ministers of the Council of Europe, 2019). Integrating expert consultation into arbitral proceedings would increase both the reliability of decisions and the efficiency of dispute resolution.

Second, arbitration in Vietnam is designed to function as an independent and flexible alternative to court litigation. However, arbitral awards remain subject to annulment by courts, particularly when evidentiary issues are at stake (Guiding the Implementation of Certain Provisions of Law on Commercial Arbitration 2014). This overlap creates tension between arbitral discretion and judicial review, especially regarding electronic evidence. To address this, a cooperative framework should be established whereby courts and arbitral tribunals adopt a harmonised standard for evaluating electronic evidence (Born, 2021). Such harmonisation would reduce the risk of arbitral awards being overturned and increase confidence in arbitration as a reliable mechanism for dispute resolution.

Third, given the prevalence of commercial disputes in a market economy, Vietnam must issue clear and comprehensive regulations on the admissibility of electronic evidence. While under Arts. 3-5 of the Law on Electronic Transactions 2023 recognises electronic data as legally valid. Still, there remains a lack of procedural guidance on how such evidence should be authenticated, preserved, and assessed in arbitral proceedings. Learning from international standards, such as Art. 3 of the IBA Rules on the Taking of Evidence in International Bar Association 2020, and the practices of arbitral institutions like Art. 22 of the International Chamber of Commerce (ICC) 2021 and Rule 19 of SIAC Rules 2016, Vietnam should codify detailed guidelines to promote consistency, transparency, and efficiency. Clear rules would not only facilitate arbitral practice but also reduce the risk of annulment when courts review awards.

Fourth, to strengthen the admissibility of electronic evidence in commercial arbitration, Vietnam should consider introducing specific statutory reforms. Firstly, the Law on Commercial Arbitration 2010 should be amended to include a separate provision defining “electronic evidence” in line with international standards such as Art. 3 of the IBA Rules (International Bar Association, 2020) and the Council of Europe Guidelines (Electronic Evidence in Civil and Administrative Proceedings 2019). Secondly, under Art. 14 of the Civil Procedure Code 2015, should be revised to harmonize its requirements on translation, authentication, and consular legalisation should be revised to harmonise with arbitral practice, ensuring that minor formal defects do not automatically preclude otherwise reliable electronic evidence (Civil Procedure Code, 2015), (Guiding the Implementation of Certain Provisions of Law on Commercial Arbitration 2014). Thirdly, Vietnam should develop technical regulations or judicial guidelines detailing procedures for the collection, preservation, and assessment of electronic evidence, drawing inspiration from the U.S. Federal Rules of Evidence (FRE) (Lorraine & Mack, 2007) and comparative best practices from Rule 19 of Singapore (SIAC Rules, 2016) and the EU (Official Journal of the European Union, 2014). Finally, a training framework for judges, arbitrators, and lawyers in digital forensics and IT literacy should be institutionalised to enhance professional competence in handling electronic evidence.

In conclusion, enhancing the legal framework for the admissibility of electronic evidence requires a multi-dimensional approach: continuous technological adaptation, greater reliance on expert involvement, closer alignment between arbitration and judicial review, and clearer procedural rules. These reforms will enable Vietnam to strengthen the credibility of its arbitration system, promote business confidence, and harmonise with international best practices in electronic evidence.

Conclusion

Electronic evidence in commercial arbitration poses many challenges due to its digital characteristics, the ability to copy and alter data, and the need for strict legal and technical mechanisms to ensure integrity, authenticity, and probative value. The acceptance and evaluation of this type of evidence not only depend on legal regulations but also require technological capacity and adaptive legal thinking among arbitrators, judges, and participants in the proceedings. In the context of digital transformation, it is necessary to complete the legal framework for electronic evidence in arbitration proceedings to unify the arbitration review mechanism and the Court's supervision, thereby limiting the cancellation of awards due to differences in approach. At the same time, Vietnam needs to issue specific guidelines on the processes for collecting, storing, and authenticating electronic data, and to increase the participation of technology experts in dispute resolution to improve the transparency, efficiency, and credibility of Vietnam's commercial arbitration system. meeting the requirements of integration and development in the digital era.

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