

VLN – Complete Legal, Security & Trust Pack

This document contains Privacy Policy, Cookie Policy, Cookie Banner Text, Data Processing Agreement (DPA) structure, and Security & Trust framework for VLN (Virtual Licensing Network).

PRIVACY POLICY – VLN

- Data Controller: VLN – Virtual Licensing Network. Operates in compliance with EU Regulation 2016/679 (GDPR).
- Data Collected: name, email, username, IP address, device info, licensing records, transaction data (via payment providers), audit logs, metadata associated with digital assets.
- Purpose: account management, license generation, forensic traceability, contract execution, fraud prevention, security, legal compliance.
- Legal Basis: contract performance (Art.6(1)(b)), legal obligation (Art.6(1)(c)), legitimate interest (security & system integrity), consent (non-technical cookies).
- Retention: data retained for duration necessary to provide services and ensure licensing traceability. Audit logs may be retained for extended periods to preserve integrity.
- Data Sharing: hosting providers, payment processors, technical suppliers, competent authorities when legally required. No sale of personal data.
- User Rights: access, rectification, erasure (within legal limits), objection, portability. Requests via designated privacy email.
- Security Measures: cryptographic hashing (SHA-256), signed audit packs, append-only ledger structure, encrypted storage, strict access controls.
- Limitation: VLN provides technical traceability tools and does not guarantee global enforcement on third-party platforms.

COOKIE POLICY – VLN

- **Technical Cookies:** required for authentication, session management, and platform security. Do not require consent.
- **Analytics Cookies (if enabled):** used for traffic analysis and service improvement. Require explicit user consent.
- **Third-Party Services:** may include hosting, CDN, payment processors or embedded services.
- **User Control:** users may accept, reject, or customize cookie preferences and may modify consent at any time.

COOKIE BANNER TEXT

- VLN uses technical cookies necessary for platform functionality and, upon consent, analytics cookies to improve services.
- Options: Accept | Reject | Customize Preferences.

DATA PROCESSING AGREEMENT (DPA) – STRUCTURE

- Role Definition: VLN acts as Data Controller for direct users and Data Processor for integrated SaaS clients.
- Subject Matter: processing of licensing data, forensic verification data, and digital asset metadata.
- Duration: valid for duration of service agreement.
- Security Measures: encryption, access control, event logging, breach notification within 72 hours.
- Sub-processors: hosting, infrastructure and payment providers.
- Confidentiality: all personnel bound by confidentiality obligations.

SECURITY & TRUST FRAMEWORK – VLN

- System Integrity: append-only event ledger ensuring immutable traceability.
- Cryptographic Hashing: SHA-256 applied to assets and audit documentation.
- Digital Signatures: audit packs signed using secure server-side cryptographic keys.
- Watermarking Layer: embedded forensic watermark tied to license_id and buyer_id.
- Access Control: role-based authentication and authorization.
- Encryption: encrypted storage and secure HTTPS transmission.
- Monitoring & Logging: activity logging and anomaly detection.
- Backup & Recovery: secure backup strategy and disaster recovery procedures.
- Transparency: clear documentation of system guarantees and limitations.