

## Regulatory Pathway Document

(For Regulated Markets)

Version: Investor / DD Grade

### 1. Executive Regulatory Summary (1–2 صفحه)

#### 1.1 Why Regulation Matters for GROWNET

- چرا محصول مشمول رگولیشن می‌شود
- چه بخش‌هایی regulated هستند و کدام نیستند (scope separation)

#### 1.2 Go / No-Go Risks

- چه مجوز‌هایی blocker واقعی هستند
- چه مواردی با workaround قابل فروش‌اند

هدف: پاسخ سریع به سؤال VC

«آیا این محصول الان قابل فروش هست یا نه؟»

### 2. Regulatory Classification (2–3 صفحه)

#### 2.1 Product Classification

SaaS / Platform / Marketplace / Data Processor

آیا: GROWNET

Processor است؟

Controller؟

Joint Controller؟

#### 2.2 Industry Mapping

Domain	Applies?	Notes
Health (HIPAA / MDR)	Optional	Only if X enabled
Fintech (PSD2)	No	No payments custody
Data Protection (GDPR)	Yes	Core
AI Regulation (EU AI Act)	Medium	Ranking / scoring

این جدول خیلی مهم است

### 3. Applicable Regulations & Standards (3–5 صفحه)

### 3.1 Data & Privacy

- GDPR •
- ePrivacy •
- Data residency (EU/Non-EU) •

### 3.2 AI / Algorithmic Regulation

- EU AI Act (Risk-based classification) •
- Explainability •
- Bias risk •

### 3.3 Platform / Marketplace Rules

- DSA (Digital Services Act) •
- Content moderation duties •
- Ranking transparency •

### 3.4 Security & Trust

- ISO 27001 (target) •
- SOC 2 Type I → Type II (roadmap) •

نشان می‌دهد تیم naive نیست

## 4. Regulatory Scope Control (2–3 صفحه)

### 4.1 What We Explicitly Do NOT Do

- No payment custody •
- No medical decision •
- No financial advice •
- No identity verification (for now) •

این بخش ریسک را می‌کشد

### 4.2 Feature Gating Strategy

Feature	Regulatory Impact	Status
User ranking	AI risk	Limited

Feature	Regulatory Impact	Status
Reviews monetization	DSA	Allowed
Expert marketplace	Liability	Gated

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## 5. Compliance-by-Design Architecture (2–3 صفحه)

### 5.1 Data Flow Compliance

- PII separation
- Regional storage
- Minimal data principle

### 5.2 Consent & Transparency

- Explicit consent
  - Audit logs
  - User rights workflow
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## 6. Phased Compliance Roadmap (3–5 صفحه)

### Phase 0 — MVP / Pilot (0–6 months)

- GDPR basic compliance
  - Privacy Policy + DPA
  - Security baseline
- Outcome: **Sell to SMB**
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### Phase 1 — Growth (6–12 months)

- ISO 27001 prep
  - DSA readiness
  - AI documentation
- Outcome: **Sell to mid-market**
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### Phase 2 — Enterprise / Regulated Clients (12–18 months)

- SOC 2 Type II

- Advanced audits •
- Dedicated compliance role •

Outcome: **Enterprise-ready**

#### 7. Cost, Time & Resource Estimates (2–3 صفحه)

Item	Cost (€)	Time
Legal review	20–40k	2–3 months
ISO 27001	30–50k	4–6 months
SOC 2	40–70k	6–9 months

Realistic ≠ optimistic

#### 8. Regulatory Risk Register (2–3 صفحه)

Risk	Probability	Impact	Mitigation
AI misclassification	Medium	High	Feature gating
Data breach	Low	High	Security controls
DSA penalties	Low	Medium	Reporting

#### 9. Go-To-Market Impact Analysis (1–2 صفحه)

##### 9.1 What We Can Sell Today

- Which customers •
- Which features •

##### 9.2 What Is Delayed by Regulation

- Which revenue streams •
- How long delay is •

VC دقیقاً این را می‌خواهد

#### 10. Regulatory Ownership & Governance (1–2 صفحه)

- Compliance owner •
- External counsel •
- Review cadence •

- Incident escalation

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## 11. Unknowns & Discovery Plan (1–2 صفحه)

### Known Unknowns

- AI Act final enforcement
- Country-specific DSA interpretation

### Discovery Plan

- Legal opinion
- Pilot customer feedback
- Sandbox tests

نشانه بلوغ بنیان‌گذار

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## 12. Regulatory Readiness Statement (1–½ صفحه)

GROWNET «دارای مسیر انطباق مرحله‌ای، قابل اجرا و همراهی با رشد کسب‌وکار است و هیچ مانع رگولاتوری پنهان برای ورود به بازار وجود ندارد».