

Compliance Statement of VTI3 Net Limited

1. Introduction

VTI3 Net Limited, an Irish-incorporated company (Reg. No. 779428), provides a federated digital infrastructure platform (“VTI3.net”) that enables individual service providers, freelancers, and creators to offer personalized products and services via messaging and social media apps.

Our platform facilitates secure commerce, identity validation, and trust scoring in compliance with local and international regulations, including:

- **EU GDPR**
- **PSD2 (Strong Customer Authentication)**
- **FATF Recommendations**
- **EU/OFAC/UN Sanctions & AML Directives**

We are committed to **privacy-respecting, trust-enabled, and compliant financial and data service operations**.

2. Regulatory Jurisdiction & Legal Entity

- **Legal Name:** VTI3 Net Limited
- **Registration Number:** 779428
- **Jurisdiction:** Republic of Ireland (EU)
- **Registered Office:** Ground Floor, 71 Baggot Street Lower, Dublin 2, D02P593, Ireland
- **Email Contact:** info@vti3.net
- **Legal Basis for EU Operations:** GDPR, PSD2, eIDAS compliance

3. Risk-Based KYC/AML Framework

We have implemented a **tiered compliance system** aligned with the FATF’s Risk-Based Approach:

Tier	Description	Method	Threshold
Passive Tier	No financial transaction, no sensitive access	No KYC	N/A
Auto-KYC Tier	Basic payments (e.g. <\$500)	Stripe + Onfido auto-check, IP/device risk scoring	Aligned with PSD2
Manual KYC Tier	Withdrawals, regulated services	Full ID & document review	OFAC, FATF, UN sanctions screening

Tier	Description	Method	Threshold
EDD Tier	High-risk or high-volume accounts (> \$10,000/month)	Manual review + SAR reporting	Reports to FIU

All identity verification is conducted using leading providers (**Stripe Identity, Onfido**). Users undergo document-based verification with built-in fraud and blacklist checks.

4. Moderation, Service Screening & UGC Compliance

VTI3.net supports a semi-open service publishing model. To ensure **content legality and platform integrity**, we employ:

- **AI-powered service categorization**
- **Auto-tagging and policy-based filtering**
- **Listing audit queue for sensitive services**
- **Client-side reporting system**
- **Moderation SLA: ≤14 days for audit of flagged content**

Illegal, abusive, adult, misleading, or deceptive content is auto-flagged and removed.

5. Data Privacy & User Protection (GDPR)

Our data processing model strictly adheres to the **General Data Protection Regulation (GDPR)** and includes:

- **Dual-role handling:** acting as Data Controller for platform actions, and Data Processor for user-managed encrypted identity
- **Privacy-by-Design:** user data is anonymized, encrypted, or stored locally whenever feasible
- **Legal bases:** consent, contract necessity, legal obligation, legitimate interest
- **Cross-border transfer mechanisms:** SCCs + user-authorized flows
- **User rights support:** access, erasure, rectification, portability, objection, consent withdrawal
- **Security Measures:** SSL, access control, pseudonymization, breach reporting

We maintain a dedicated [Privacy Policy](#) and [Cookies Policy](#), regularly reviewed for regulatory alignment.

6. Trust, Creditworthiness & Fraud Mitigation

We implement a proprietary **Proof-of-Trust (PoT) framework**, combining:

- **Connection Mapping** (social graph correlation)
- **Heat-Weighted Reviews** (emphasize recent high-signal feedback)
- **Trust Score Computation** (per-user adaptive weighting)
- **Manipulation Filters** (detect fake reviews/bots)
- **KYC-anchored Identity** (DID-based trust + minimal disclosure)

This enables **user-to-provider trust without violating privacy**, ensuring safer transactions across federated IndiApps.

7. Payment Infrastructure & Legal Basis

VTI3.net does not process or store payment credentials directly. Instead, we integrate:

- **PCI-DSS-compliant partners** (e.g., Stripe, banking APIs)
- **Message-based payment routing** (secure order links)
- **Custom descriptors to reduce chargebacks**
- **Deposits, refunds, and dispute mediation**
- **Revenue model**: SaaS, custom onboarding fees, API usage, platform commissions

Our financial operations fall under **non-custodial, B2B2C infrastructure provider** scope, and we maintain banking partnerships for segregated funds management.

8. Complaint Resolution & Auditability

- **Dispute Resolution System**: 24/7 customer support, with 90% of disputes resolved within 24 hours
 - **Chargeback & Fraud Mitigation**: smart billing descriptors, Trust Score thresholding
 - **Audit Trails**: Moderation, payment, and KYC logs retained per GDPR and AMLD requirements
 - **SAR/STR Reports**: High-risk behavior reported to appropriate Financial Intelligence Units (FIUs)
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9. Commitment to Ongoing Compliance

We continuously monitor regulatory updates across:

- **European Union (PSD3, AMLR, MiCA)**
- **OECD, FATF, and GFIN**
- **Payment service directives and AML regimes in APAC, LATAM, MENA**

Periodic reviews of:


- KYC/AML policies
- Data handling practices
- Cross-border transfer legality
- Service eligibility under local rules

will be conducted to ensure continuous compliance.


10. Technical & Data Security Controls

VTI3 Net implements a layered security architecture, combining industry-leading compliance protocols with internal audit frameworks based on our completed **PSC (Platform Security Checklist) A-Tier Self-Assessment Report**.

10.1 System Architecture & Isolation

- **Microservices infrastructure** with strict service-level segregation
 - Sensitive modules (KYC, Trust Scoring, Payment Routing) run in **dedicated environments**
 - **API gateway enforcement** with OAuth2.0 + scoped access tokens
-  Internal penetration tests conducted quarterly; external pen-test vendors reviewed bi-annually

10.2 Access & Authentication Controls

- **RBAC** (Role-Based Access Control) for all platform modules
 - Admin & moderator access protected via **MFA (Multi-Factor Authentication)**
 - Key user actions (moderation, KYC approval, dispute resolution) are **logged and signed**
-  All staff access is governed by least privilege principle and audit-logged.

10.3 Data Encryption & Integrity

Data Class	In Transit	At Rest	Audit Scope
User PII	TLS 1.3	AES-256	GDPR, ISO 27001
KYC Images	TLS	AES-256 + temp access policy	Stripe/Onfido API scoped
Messaging Metadata	Encrypted	Pseudonymized	GDPR legitimate interest
Trust Score Data	Internal-only	Hashed + Encrypted	AI ethics audit log

-  Database backups are encrypted, versioned, and retained per jurisdictional compliance policies.

10.4 Application-Level Protection

- Built-in **rate limiting**, **WAF (Web Application Firewall)**, and **IP-based access control**
- Protection against OWASP Top 10 threats, including:
 - SQLi, XSS, IDOR, SSRF, CSRF, etc.
- Real-time anomaly detection for abusive behavior and unexpected API calls

10.5 Data Residency & Transfer

- Primary infrastructure hosted in **EU-based zones (Ireland/Germany)**
- Non-EU data access governed by **Standard Contractual Clauses (SCCs)**
- Customer data is **not shared with sub-processors** without consent or lawful basis

10.6 Incident Response & Business Continuity

- 24/7 SOC alerts on infrastructure-level anomalies
- **Defined IRP (Incident Response Plan)** for data breach, DDoS, abuse escalation
- Recovery Point Objective (RPO): < 1 hour; Recovery Time Objective (RTO): < 4 hours

10.7 Certifications & Compliance Alignment

Framework	Status
PCI DSS	Covered via Stripe & payment providers
ISO/IEC 27001	Internal alignment, certification pending 2025
GDPR	Fully implemented across data lifecycle
PSD2 SCA	Applied to all relevant payment flows
PSC-A	Self-Assessment Completed Q1 2025

11. Declaration

VTI3 Net Limited hereby affirms our commitment to operate in full compliance with applicable financial, data protection, and anti-abuse regulations. We welcome audit inquiries, licensing dialogues, and regulatory feedback.

Signed,

Managing Director: Yunan LIU
VTI3 Net Limited
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05 April, 2025