

Privacy Policy

Last Updated: 29.04.2025

1. Introduction

Net Info EAD, UIC: 202632567 ("**Net Info**") is committed to safeguarding the personal data of all users of its services ("**User**") and ensuring compliance with the General Data Protection Regulation (GDPR), Bulgarian Data Protection Act and other relevant data protection laws. This Privacy Policy explains how Net Info collects, uses, discloses, and protects the personal data of the Users when using the Vbox8 video editing software (the "**Service**"). Net Info is the controller and responsible for personal data of Users, except where Net Info processes User personal data because User uses the Service as a result of User's relationship with a customer who Net Info supplies its Service to (for example, if a User uses the Service as a result of the User being an employee or client of a Net Info customer) – in this case Net Info acts as a data processor.

Where Net Info processes User personal data because the User accesses the Service through their relationship with a customer to whom Net Info provides the Service, Net Info is not the data controller, as it is processing the personal data on behalf of its customer as a data processor. In such cases, Users should refer to the privacy policy of Net Info's customer, which will outline how their personal data is processed.

By accessing and using the Service, Users confirm that they have read, understood, and agree to the terms described in this Privacy Policy. This Policy is an integral part of the General Terms of Use of the Service and the respective Subscription Agreement. This Privacy Policy is available at any time on the Service's website at: www.vbox8.com.

Contact details:

- Data Controller: "Net Info" EAD
- Contact for the Data Protection Officer (DPO): dpo@netifno.bg
- Address: Sofia, 10 Nedelcho Bonchev Street

2. Information Net Info Collects and Processes

Net Info collects and processes two primary categories of personal data:

2.1 Account Data

This includes information provided during account registration and management, such as:

- a. Names and professional roles of authorized Users;
- b. Business contact details, including email address, telephone number, and physical address;
- c. Payment and billing information;
- d. Company registration details and legal status;
- e. User access logs and activity records.

Net Info collects this data directly from Users during account registration or updates, through communication with customer support or service requests, or automatically through log files when using the Service

Purpose of Processing: Net Info processes this data to manage User's subscription, provide customer support, ensure Service security, fulfill contractual obligations, and comply with legal requirements.

2.2 Uploaded Data

This encompasses any content Users upload, create, or process through the Service, including:

- a. Videos, audio, text, metadata;
- b. Facial images and other biometric data (if applicable).

Purpose of Processing: Net Info processes uploaded data to ensure the functionality of the Service, including content editing and management, storage, and providing access to User's content in accordance with the instructions of Users. Additionally, Net Info optimizes service performance, ensures compatibility with various devices, and complies with its legal obligations, including security measures and protection against misuse.

Net Info does not utilize facial recognition or analysis technologies. The Service focuses exclusively on video editing, asset management, and content delivery. Users are solely responsible for ensuring they have a lawful basis for processing any personal data, particularly biometric data, contained within their uploaded content. This includes obtaining consent where necessary, performing data protection impact assessments (DPIAs) when required, and adhering to principles of data minimization and purpose limitation.

Net Info does not process biometric data except for the purposes of storing and editing content by Users.

2.3 Technical and Usage Data

In addition to account and uploaded content, Net Info collects certain technical data automatically when Users interact with the Service. This may include:

- a. Internet Protocol (IP) address;

- b. Login data and authentication tokens;
- c. Browser type and version, time zone setting, and location;
- d. Browser plug-in types and versions;
- e. Operating system, platform, and device type;
- f. Language preferences and screen resolution;
- g. Device identifiers and session data;
- h. Information in or about the uploaded audio or video files, such as embedded metadata (e.g., creation date, geolocation data, camera settings, and file format).

This data is collected to improve the functionality, performance, and security of the Service, perform analytics, and ensure compatibility with various devices and browsers. Net Info may also use this information to detect misuse, prevent fraud, and maintain audit logs in compliance with its legal obligations and legitimate interests under Article 6(1)(f) GDPR.

2.4 Special Categories of Personal Data

Net Info does not require the provision of special categories of personal data (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, and genetic and biometric data). Nor does Net Info ask for any information about criminal convictions and unlawful offences.

However, it is possible that special categories of personal data, including biometric data, may be uploaded or otherwise provided through the use of the Service. When such data is provided for a User, the User gives their explicit consent to its processing, to the extent permitted by Article 9(2) (a) of GDPR and the applicable Bulgarian data protection laws. If a User uploads or provides special categories of personal data concerning another individual, the User bears full responsibility for ensuring that the individual has given explicit consent for the processing of such data in accordance with this Privacy Policy, the GDPR, and Bulgarian legislation. This consent must be freely given, specific, informed, and unambiguous, and must permit the processing of such data through the Service. If there is no explicit consent or other valid legal basis under Article 9 of GDPR, content containing such personal data should not be uploaded. By using the Service, Users confirm and accept full responsibility for ensuring that the data they upload has been lawfully obtained and processed in accordance with all applicable data protection regulations.

Where personal data, including special categories of personal data, is processed and uploaded for the sole purpose of journalistic activity, as defined under Article 85 of GDPR and the relevant provisions of the Bulgarian Personal Data Protection Act, certain rights and obligations under this Privacy Policy and the GDPR may not apply. This exemption applies only to processing carried out in the public interest, in the context of legitimate journalistic activity, and where such processing respects the balance between freedom of expression and the protection of individual rights. If a User relies on this exemption, the User bears full responsibility for ensuring that the use of the Service complies with the requirements for journalistic activity under the applicable laws.

3. Legal Basis for Processing

Net Info processes personal data of Users based on the following legal grounds under GDPR:

- a. **Contractual Necessity:** To fulfill its contractual obligations under the Terms of Use and Subscription Agreement, including provision of services and account management (Article 6(1)(b) GDPR).
- b. **Legitimate Interests:** To improve the Service, provide customer support, communicate with Users, send service-related updates, and prevent fraud, provided that the rights and interests of Users are not overridden (Article 6(1)(f) GDPR).
- c. **Legal Obligations:** To comply with tax laws, regulatory requirements, and other legal mandates (Article 6(1)(c) GDPR).
- d. **Consent:** When processing special categories of personal data, explicit consent will be obtained where necessary. Additionally, Net Info relies on the consent of Users for marketing communications, promotional materials, and newsletters. Users can withdraw their consent at any time by adjusting their preferences or contacting Net Info (Article 6(1)(a) and 9(2)(a) GDPR).

4. Data Sharing and Disclosure

Personal data of Users may be shared with the following entities, ensuring that appropriate safeguards are in place:

- a. **Data Processors:** Net Info engages third-party vendors and service providers, acting as data processors under Article 28 of the GDPR, to assist in the operation, maintenance, and enhancement of the Service. These processors perform specific tasks on behalf of Net Info and may include providers of cloud infrastructure, payment processing, customer support systems, analytics and monitoring tools, and artificial intelligence or automation-based services. The latter may support functionalities such as automated captioning, content tagging, noise reduction, and other machine learning-assisted enhancements within the video editing environment.

All such processing activities are governed by Data Processing Agreements (DPAs) that Net Info enters into with each processor, in full compliance with GDPR requirements. These agreements clearly define the subject matter, duration, purpose, and nature of the processing, and strictly require the processor to act only on the documented instructions of Net Info. Where processors rely on sub-processors, they must obtain the prior written authorization of Net Info and flow down equivalent contractual obligations to ensure continued protection of personal data. Net Info performs due diligence when selecting processors, including reviews of their security posture, privacy practices, and legal compliance.

Particular attention is given to AI and automation tools integrated into the Service to ensure that such technologies do not involve automated decision-making with legal or similarly significant effects on individuals without appropriate safeguards, such as human oversight or additional user controls.

A list of the current data processors and authorized sub-processors is available upon request, subject to applicable confidentiality considerations.

- b. **Legal Authorities:** To comply with legal obligations, respond to lawful requests, subpoenas, or address legal proceedings, or when disclosure is necessary to protect the legal rights of Net Info or defend against legal claims.
- c. **Business Transfers:** In cases of mergers, acquisitions, restructuring, or sales of assets, Net Info may transfer data as part of the transaction. Appropriate safeguards, including contractual commitments, will be implemented to protect data during such transitions.
- d. **Third-Party Platforms:** If a User chooses to publish, share, or export content from the Service to a third-party platform—such as social media networks, video hosting services, or cloud storage providers—the User does so at their own risk. These third-party platforms operate as independent data controllers, meaning they determine how they process data. Their privacy policies, terms of service, and data security practices may differ from Net Info's.

Net Info does not control, endorse, or take responsibility for how third-party platforms collect, use, store, or secure data of Users. Once content is shared, the recipient platform's policies govern its further processing. Before sharing content, Users should carefully review the privacy policies, data handling practices, and security measures of any third-party service. Users are responsible for ensuring that the data they share complies with GDPR, Bulgarian data protection laws, and any other applicable regulations. If the content contains personal data or sensitive information, the User must ensure that they have obtained the necessary permissions, consents, and legal justifications for such disclosures. Net Info recommends that Users exercise caution when sharing personal or confidential data on external platforms, as Net Info cannot guarantee how that data will be handled once it leaves its own ecosystem.

- e. **Other Situations:** With the explicit consent of a User, Net Info may share their information with other third parties for specific purposes that the User authorizes. If required by applicable law, or in cases where disclosure is necessary to protect the rights, safety, or property of the users, employees, or the public, the information might be shared.

5. Data Security

Net Info implements industry-leading security measures to protect personal data, amongst which:

- a. **Encryption:** Data is encrypted both in transit and at rest.
- b. **Access Controls:** Two-factor authentication (2FA) and strict role-based access.

- c. **Regular Security Audits:** Penetration testing, vulnerability scans, and risk assessments.
- d. **Disaster Recovery & Data Loss Prevention Measures.**
- e. **Incident Response Plan:** In the event of a security breach affecting personal data of Users, Net Info will initiate its Incident Response Plan immediately. Net info will notify the affected Users within 72 hours of becoming aware of the incident, if a high risk to their rights and freedoms has been established, in accordance with GDPR Article 33. The notification will include details of the nature of the breach, the categories of affected data, potential risks, and recommended measures to mitigate harm.

Where necessary, Net Info will also inform the relevant data protection authority and cooperate fully to resolve the incident. In critical cases where there is a high risk to user rights and freedoms, Net Info will provide direct communication via email or other available contact methods.

6. Data Retention

Net Info retains personal data only for as long as necessary to fulfill the purposes outlined in this policy or as required by law:

- a. **Account Data:** Retained for the duration of User's active subscription and as needed for legal compliance.
- b. **Uploaded Data (Including Biometric Data):** Users retain control over data retention. Upon account termination, the account data, as well as all information available in the account, will be deleted in compliance with legal obligations. Deleted content cannot be restored.
- c. **Technical data/Cookie data:** Technical data related to user account logins is stored for a period of 6 months, in accordance with the requirements of the Electronic Communications Act. Cookie data is stored for the duration of the respective cookie or until consent is withdrawn.
- d. **Financial data:** Certain financial data, including payment records, invoices, and billing details, is retained for accounting, tax compliance, and financial auditing purposes in accordance with applicable financial regulations. This data is stored securely and retained for a period of up to five (5) years after the termination of an account or the completion of the relevant financial transaction, unless a longer retention period is required by law. After this period, financial data will be deleted or anonymized, except where required for ongoing legal obligations or dispute resolution.
- e. **Automated Retention Schedules:** Data is routinely reviewed and deleted when no longer necessary.

7. Users' Rights

7.1 As a data subject under the General Data Protection Regulation (GDPR), Users have the following rights regarding their personal data:

- a. **Right of Access:** Users have the right to request confirmation as to whether Net Info processes their personal data and, if so, to obtain a copy of that data, along with details on how and why it is processed.
- b. **Right to Rectification:** If Users' personal data is inaccurate or incomplete, they have the right to request correction or completion without undue delay.
- c. **Right to Erasure ("Right to be Forgotten"):** Users may request the deletion of their personal data where: (i) The data is no longer necessary for the original purpose of collection; (ii) They withdraw their consent (where processing was based on consent); (iii) They object to processing, and there are no overriding legitimate grounds; (iv) The data was unlawfully processed; (v) Deletion is required to comply with legal obligations. This right is subject to legal and regulatory obligations that may require Net Info to retain certain data.
- d. **Right to Restriction of Processing:** Users may request that Net Info temporarily restricts the processing of their data in the following circumstances: (i) If User contests the accuracy of the data (while Net Info verifies and corrects it); (ii) If processing is unlawful, but User opposes erasure and requests restriction instead; (iii) If Net Info no longer needs the data, but User requires it for legal claims; (iv) If User has objected to processing, and Net Info is verifying whether its legitimate grounds override User's rights.
- e. **Right to Data Portability:** Users can request a copy of their personal data in a structured, commonly used, and machine-readable format, and have the right to transmit that data to another service provider where: (i) Processing is based on consent or contractual necessity; (ii) Processing is carried out by automated means.
- f. **Right to Object:** Users may object to the processing of their personal data where it is based on legitimate interests, including profiling. If a User objects, Net Info will cease processing unless Net Info demonstrates compelling legitimate grounds that override the User's interests or if processing is necessary for legal claims.
- g. **Right to Withdraw Consent:** If Net Info relies on User's consent for data processing, the User may withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.
- h. **Rights Related to Automated Decision-Making:** Users have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects Users. Exceptions may apply if: (i) The decision is necessary for a contract; (ii) User has given explicit consent; (iii) It is authorized by law with safeguards in place.

Net Info do not currently engage in AI-driven automated decision-making that significantly affects users. If this changes, Net Info will provide clear information and an option to opt-out.

7.2 Exercise of Users' Rights

If a User wishes to exercise any of these rights, they must contact Net Info at dpo@netinfo.bg. Net Info will review and respond to each inquiry within one (1) month of its receipt. If an extension of this period is necessary (for example, due to the complexity or number of submitted requests), the User will be informed in a timely manner, and Net Info will indicate the reason for the extension and the expected response time.

To protect the User's privacy, Net Info may request additional information in order to verify the User's identity before processing the request.

If the User believes that Net Info has not responded appropriately to a request, the User has the right to lodge a complaint with the competent data protection supervisory authority in the relevant jurisdiction.

8. International Data Transfers

In the course of providing the Service, personal data may be transferred to, accessed from, or processed in countries outside of Bulgaria and the European Economic Area (EEA), including jurisdictions that may not offer the same level of data protection as those within the EEA. All such international data transfers are carried out in strict compliance with Chapter V of the GDPR. Net Info ensures that appropriate safeguards are implemented to protect personal data, including but not limited to:

- a. **Standard Contractual Clauses (SCCs)** approved by the European Commission, which impose contractual obligations on the recipient to ensure adequate data protection;
- b. **Adequacy Decisions** issued by the European Commission, where applicable; and
- c. **Supplementary technical and organizational measures**, such as encryption, pseudonymization, and strict access controls, where necessary.

Net Info conducts transfer impact assessments (TIAs) where required to evaluate the legal environment and risk profile of the recipient country.

By using the Service, Users acknowledge that such international transfers may occur and consent to the transfer of their personal data under the conditions set out in this Privacy Policy. If material changes are made to the transfer mechanisms or destinations, Net Info will provide notice in accordance with Section 13 (Changes to This Policy).

9. Data Protection Impact Assessments (DPIAs)

When necessary, Net Info conducts DPIAs to assess and mitigate risks associated with data processing, especially for biometric data or large-scale processing activities.

10. Use of AI and Automated Processing in Video Editing

Net Info may incorporate artificial intelligence (AI) and machine learning technologies within the Service to support and enhance video editing functionalities. These tools may be used for purposes such as, but not limited to:

- a. Automated scene recognition, tagging, and segmentation;
- b. Audio enhancement and noise filtering;
- c. Speech-to-text conversion and automatic captioning;
- d. Translation and content summarization;
- e. Quality enhancement, resizing, and formatting.

These AI-powered features, integrated in the Service, are intended to assist Users by improving efficiency, accuracy, and editing capabilities. The processing carried out by these tools does not involve fully automated decision-making that produces legal or similarly significant effects on Users within the meaning of Article 22 GDPR.

Where any AI-based feature may materially affect individuals or content outcomes, such tools will either: i) involve human oversight or review, or ii) be subject to additional safeguards, and iii) be clearly indicated within the Service.

If, in the future, features involving fully automated decision-making are introduced, Net Info will update this Privacy Policy and implement all safeguards required under the GDPR, including the provision of human intervention, the right to express an opinion, the right to contest the decision, and mechanisms for opting out.

11. Cookies and Similar Technologies

Net Info uses cookies and similar technologies (including local storage, web beacons, and SDKs) to collect and store certain technical information when interacting with the Service. These technologies help deliver, secure, and optimize the Service, as well as personalize the user experience. Cookies are small text files that are stored on Users' devices when visiting a website or using an online service. They enable device recognition, the preservation of user preferences, and the enhancement of the Service's functionality and performance.

Net Info uses the following categories of cookies:

- a. **Strictly Necessary Cookies:** These cookies are essential for the operation of the Service. They enable basic functions such as page navigation, secure login, and access to protected areas of the Service. These cookies do not require user consent.
- b. **Performance and Analytics Cookies:** These cookies collect information about how Users interact with the Service, such as which pages are visited most often, error messages received, and load times. This data is used to improve functionality and user experience. These cookies may be set by Net Info or by third-party analytics providers.

- c. **Functionality Cookies:** These cookies allow the Service to remember User preferences and provide enhanced, more personalized features. For example, they may remember the language settings of a User or automatically resume their last session.

Where legally required, Net Info will request explicit consent before placing or accessing non-essential cookies on devices of Users. Users may manage their cookie preferences through the cookie banner placed by Net Info or by adjusting their browser settings. Users must note that disabling certain cookies may affect the functionality of the Service.

A detailed list of the cookies Net Info uses, their purpose, duration, and whether they are first-party or third-party cookies is available below:

Cookie Name	Purpose	Term	Data retention
vbox8_session	Remember the session to keep the user logged in	sessional	Session ID
XSRF-TOKEN	token for prevention of unauthorized requests	sessional	Writes XSRF token in the request
remember_web_	remember me cookie (only if the checkbox is checked when logging in)	6 (six) months	Service information

12. Right to Lodge a Complaint

If a User believes their personal data has been processed unlawfully, they have the right to lodge a complaint with a supervisory authority. In Bulgaria, the relevant authority is: Commission for Personal Data Protection (CPDP)

- Address: 2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia, Bulgaria
- Website: www.cdpd.bg

13. Changes to This Policy

This Privacy Policy may be updated periodically to reflect changes in legislation, technological requirements, or Net Info's internal practices regarding personal data protection. The updated version of the Policy will always be published on the Service's website.

In the event of material changes to the content of the Policy (such as changes in the purposes of processing, categories of data, legal basis, or data subject rights), Users will be notified through appropriate communication channels.

Continued use of the Service after the publication of such changes will be considered as acceptance of the updated Policy.

14. Contact Us

For questions or concerns about this Privacy Policy or the processing of personal data, Users must contact Net Info at dpo@netinfo.bg.