

EU AI Act Conformance Statement

Regulation (EU) 2024/1689

Organization: Datacendia, Inc.
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Regulation Referenced: Regulation (EU) 2024/1689 — Artificial Intelligence Act
Classification: Public

Purpose

This document declares the current conformance posture of Datacendia's AI decision governance platform against the EU Artificial Intelligence Act. This is a voluntary self-assessment, not a formal conformity assessment under the regulation.

Risk Classification

Datacendia is infrastructure used within high-risk AI systems. It is not itself a standalone AI system that makes autonomous decisions. Rather, it provides the governance, auditability, and verification layer that enables deployers to meet their obligations under the EU AI Act.

Under Article 6 and Annex III, Datacendia's customers may deploy it within high-risk use cases including:

- Critical infrastructure management
- Employment and worker management decisions
- Access to essential public and private services
- Law enforcement and border control support
- Administration of justice and democratic processes

Datacendia's architecture is designed to satisfy the requirements imposed on high-risk AI systems regardless of deployment context.

Requirements Mapping

Article 9 — Risk Management System

Requirement	Status	Implementation
Continuous iterative risk management	Conformant	Pre-execution risk surfacing via multi-agent deliberation; adversarial stress-testing available
Identification and analysis of known risks	Conformant	Multi-perspective agent architecture designed to identify risks from legal, financial, ethical, and operational viewpoints
Estimation and evaluation of risks	Conformant	Risk scoring, confidence metrics, and Trust Delta computation
Risk mitigation measures	Conformant	Escalation paths, policy gates, human-in-the-loop enforcement, override controls
Residual risk communication	Conformant	Full deliberation transcripts with dissent preserved and accessible to deployers

Article 10 — Data and Data Governance

Requirement	Status	Implementation
Training, validation, testing datasets	Not Applicable	Datacendia does not train AI models; it orchestrates and governs their outputs
Data quality criteria	Partially Conformant	Input data provenance tracked per decision; formal data quality certification planned

Data governance practices	Partially Conformant	Organization-scoped data isolation; cross-jurisdiction data residency controls; formal data governance cadence planned
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Article 11 — Technical Documentation

Requirement	Status	Implementation
General system description	Conformant	Architecture documentation, API specifications, and operational guides maintained
Design specifications	Conformant	Decision governance architecture fully documented
Development process description	Conformant	Version-controlled codebase with CI/CD pipeline and automated testing
Monitoring and oversight capabilities	Conformant	OpenTelemetry instrumentation, Prometheus metrics, structured logging

Article 12 — Record-Keeping

Requirement	Status	Implementation
Automatic logging	Conformant	Every decision produces a cryptographically signed audit record with timestamps, agent contributions, evidence citations, and reasoning chains
Traceability	Conformant	Merkle root integrity verification; hash chain linking; Decision DNA artifacts
Log retention	Conformant	Configurable retention policies; immutable audit ledger with append-only architecture

Article 13 — Transparency and Provision of Information

Requirement	Status	Implementation
Instructions for use	Conformant	API documentation, deployment guides, and operational procedures provided
Capabilities and limitations	Conformant	Platform does not claim autonomous decision authority; limitations clearly documented
Human oversight measures	Conformant	Escalation paths, override controls, and mandatory review triggers documented
Interpretability	Conformant	Full deliberation transcripts with natural language reasoning; decision replay capability

Article 14 — Human Oversight

Requirement	Status	Implementation
Human oversight by design	Conformant	Mandatory human-in-the-loop escalation for high-risk decisions; no autonomous execution without explicit authority
Ability to understand system	Conformant	Decision transcripts, evidence citations, and agent reasoning accessible to human reviewers
Ability to override	Conformant	Override mechanism with mandatory justification, authority verification, and audit trail
Ability to intervene or halt	Conformant	Real-time decision pipeline with intervention points; policy gates can halt execution

Article 15 — Accuracy, Robustness, and Cybersecurity

Requirement	Status	Implementation
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Accuracy levels documented	Conformant	Agent confidence metrics, Trust Delta computation, and governance effectiveness tracking
Resilience against errors	Conformant	Multi-perspective deliberation reduces single-point-of-failure risk; dissent mechanism surfaces errors before execution
Cybersecurity measures	Conformant	Cryptographic integrity, HSM/KMS signing, tamper-evident audit ledger, rate limiting, input sanitization, defense-in-depth architecture
Adversarial robustness	Conformant	Adversarial Red Team mode available for stress-testing; honeypot endpoints for intrusion detection

Prohibited Practices (Article 5)

Datacendia does not:

- Perform subliminal manipulation
- Exploit vulnerabilities of specific groups
- Conduct social scoring
- Perform real-time biometric identification
- Infer emotions in workplace or educational contexts

The platform is governance infrastructure. It does not make autonomous decisions or perform any of the practices prohibited under Article 5.

Deployer Obligations Support

Datacendia is designed to help deployers meet their obligations under Article 26:

Deployer Obligation	How Datacendia Helps
Use AI system in accordance with instructions	Decision governance framework enforces usage boundaries
Ensure human oversight	Mandatory escalation paths and override controls
Monitor AI system operation	Real-time metrics, logging, and alerting infrastructure
Keep logs	Immutable, cryptographically signed audit records
Inform affected persons	Decision transparency artifacts available for disclosure
Conduct fundamental rights impact assessment	Multi-perspective deliberation surfaces rights-related concerns pre-execution

Planned Actions

Action	Target Date
Formal conformity self-assessment using harmonized standards	Q2 2026
Engagement with notified body for high-risk use cases	Q4 2026
Registration in EU database (if required by deployment context)	Upon first EU deployment

Statement

Datacendia's AI decision governance platform is designed to conform to the requirements of the EU Artificial Intelligence Act for high-risk AI system

infrastructure. The controls, transparency mechanisms, and oversight capabilities described in this document are operational in the current platform build.

This statement is a voluntary self-assessment. Formal conformity assessment will be conducted in coordination with deployers and, where required, notified bodies.

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