

Regulatory Mapping: GDPR · EU AI Act · eIDAS 2.0

1. GDPR Positioning (EU 2016/679)

- Role: Client = Data Controller; Execution Layer = Technical Data Processor.
- Processing Scope: Limited to execution of user-initiated technical actions.
- Data Minimization: No profiling, no enrichment, no behavioral analytics.
- Logging: Structured execution logs with limited retention (TTL-based).
- Purpose Limitation: Execution-only infrastructure, no secondary use of data.
- Data Subject Rights: Handled by Controller; technical assistance possible.

2. EU AI Act Positioning

- Execution Layer performs deterministic technical execution.
- No learning, inference, profiling, or autonomous decision-making.
- No AI model training or adaptive logic.
- Does not qualify as high-risk or decision-making AI system.
- Acts strictly on user-defined parameters and confirmed events.

3. eIDAS 2.0 / EUDI Readiness

- Execution infrastructure compatible with identity-confirmed events.
- Does not act as Qualified Trust Service Provider (QTSP).
- Supports wallet-triggered lifecycle execution without identity storage.
- Separation of identity verification from execution logic.
- Audit-ready traceability for identity-linked execution events.

4. Regulatory Boundary Statement

- No legal, tax, or compliance advice is provided.
- Execution infrastructure supports compliance architecture but does not replace professional assessment.

- Responsibility for regulatory compliance remains with the Client.