

Customer evidence pack

NovaChat Customer Assistant

Northstar Support Labs

Enterprise customer-support workflow

Engagement: 50505050-5050-4050-8050-505050505050

Pack schema version: 1.0

Pack review date: 2026-07-31

Official-source review date: 2026-07-31

Human review status: draft requires review

Drafting mode: rules

Boundary: operational drafting assistance only. Customer facts, implementation, approvals, and final legal interpretation require human review.

Contents

EU regulatory evidence perimeter [13 regimes / 39 conditional control clusters]

Specialist routing perimeter [12 trigger families]

Article 50 evidence matrix [surface-level detail]

01 Role and scope map [role_scope_map]

02 Surface register [surface_register]

03 Disclosure pack [disclosure_pack]

04 Marking test record [marking_test_record]

05 Gap and decision register [gap_decision_register]

06 Implementation tickets [implementation_tickets]

07 Evidence index [evidence_index]

08 Buyer trust brief [buyer_trust_brief]

09 Counsel handoff [counsel_handoff]

Every artifact in this PDF is editable in the JSON and CSV exports and remains subject to the human-review status on the cover.

EU regulatory evidence perimeter

Operator-reviewed conditional evidence map for the declared workflow. It records what is triggered, what is not triggered, the evidence state, owned gaps, and counsel gates. It is not a legal-compliance conclusion.

Declared-workflow coverage mapped: yes | Catalog fresh: yes | Evidence ready: no | Open counsel decisions: 0 | Open specialist reviews: 0

Catalog: eu-core-2026-07-31-v3 | Source review date: 2026-07-31 | Catalog SHA-256:
b6f313d3da71b2a849b45e5eea68cf48706d3c2607924142c1f70a78ec719cb0

Controls: 39/39 assessed | 1 triggered | 38 not triggered | 0 evidence ready | 1 evidence gaps | 0 unknown

Specialist routing: 12/12 assessed | 12 not triggered | 0 specialist review required | 0 evidence mapped

39/39 configured catalog rows and 12/12 specialist routing families assessed for the recorded scope. This is operational evidence mapping and assessed routing, not complete coverage of EU law or a legal-applicability or compliance conclusion.

EU Artificial Intelligence Act

Regulation (EU) 2024/1689, as amended

EU-AIA-01 | Role, territory, and system-scope classification

Articles: Articles 2, 3 and 25 | Applicability: triggered | Conclusion: evidence gap | Evidence lifecycle: open

Evidence: none | Owner: Product owner | Counsel reference: none

Rationale: The fictional workflow triggers a recorded AI Act evidence action; final role allocation remains a human decision.

Open item: Provider and deployer allocation needs confirmation. | Owner: Product owner | Next: Confirm the recorded supply-chain role against the product facts and contract.

EU-AIA-02 | AI literacy measures

Articles: Article 4 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-AIA-03 | Prohibited-practice screening

Articles: Article 5 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-AIA-04 | High-risk classification and lifecycle duties

Articles: Articles 6 and 9-27, Annexes I and III | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-AIA-05 | General-purpose AI model duties

Articles: Articles 51-56, Annex XI | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-AIA-06 | Article 50 transparency evidence bridge

Articles: Article 50(1)-(5) | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-AIA-07 | Monitoring, logs, incidents, and corrective action

Articles: Articles 20, 26, 72 and 73 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

General Data Protection Regulation

Regulation (EU) 2016/679

EU-GDPR-01 | Controller, processor, purpose, and data-flow record

Articles: Articles 4, 5, 24, 26, 28 and 30 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-GDPR-02 | Lawful basis and special-category conditions

Articles: Articles 5, 6, 9 and 10 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-GDPR-03 | Privacy information and provenance transparency

Articles: Articles 12-14 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-GDPR-04 | Data-subject rights and automated decisions

Articles: Articles 15-22 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-GDPR-05 | Data protection by design, security, and DPIA

Articles: Articles 25, 32, 35 and 36 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-GDPR-06 | Processors, international transfers, and personal-data breaches

Articles: Articles 28, 32-34 and 44-49 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

e-Commerce Directive

Directive 2000/31/EC, as amended, and applicable national transposition

EU-ECOM-01 | Information-society service identity and commercial transparency

Articles: Articles 5 and 6 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-ECOM-02 | Electronic-contract ordering and error-correction controls

Articles: Articles 9-11 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

Digital Services Act

Regulation (EU) 2022/2065

EU-DSA-01 | Intermediary-service role and baseline duties

Articles: Articles 3, 11-18 and 24 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-DSA-02 | Platform, recommender, advertising, and systemic-risk duties

Articles: Articles 25-28 and 34-42 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

Data Act

Regulation (EU) 2023/2854

EU-DATA-01 | Connected-product and related-service data access

Articles: Articles 3-7 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-DATA-02 | Data-processing service switching and interoperability

Articles: Articles 23-35 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

Trade Secrets Directive

Directive (EU) 2016/943 and applicable national transposition

EU-TS-01 | Trade-secret acquisition, use, disclosure, and protection boundary

Articles: Articles 2-5 and 9 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

NIS2 Directive

Directive (EU) 2022/2555

EU-NIS2-01 | Entity scope, management accountability, and cyber-risk measures

Articles: Articles 2, 3, 20 and 21, Annexes I and II | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-NIS2-02 | Supply-chain security and significant-incident reporting

Articles: Articles 21 and 23 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

Cyber Resilience Act

Regulation (EU) 2024/2847

EU-CRA-01 | Product-with-digital-elements scope and conformity route

Articles: Articles 2, 3, 7-12 and 32, Annexes III and IV | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CRA-02 | Secure lifecycle and vulnerability handling

Articles: Articles 13 and 18, Annex I | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CRA-03 | Exploited-vulnerability and severe-incident reporting

Articles: Articles 14 and 16 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

Product Liability Directive

Directive (EU) 2024/2853

EU-PLD-01 | Product, software, defect, and economic-operator mapping

Articles: Articles 4, 7 and 8 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-PLD-02 | Disclosure, preservation, and post-release change evidence

Articles: Articles 9-11 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

European Accessibility Act

Directive (EU) 2019/882

EU-EAA-01 | Covered product or service accessibility requirements

Articles: Articles 2-4, 13 and 15, Annex I | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-EAA-02 | Accessibility information, conformity, and remediation records

Articles: Articles 7-14 and 19, Annexes II, V and VI | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

ePrivacy Directive

Directive 2002/58/EC, as amended

EU-EPRIV-01 | Terminal-equipment storage and tracking choices

Articles: Article 5(3) | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-EPRIV-02 | Communications confidentiality, metadata, and direct marketing

Articles: Articles 5, 6 and 13 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU copyright, software, and database rights

Directives (EU) 2019/790, 2001/29/EC, 96/9/EC, and 2009/24/EC

EU-CDSM-01 | Text-and-data-mining access and rights reservations

Articles: Articles 3 and 4 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CDSM-02 | Content input, reproduction, communication, and publication rights

Articles: Directive 2001/29/EC Articles 2-5, Directive (EU) 2019/790 Articles 15-17 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CDSM-03 | Database copyright and extraction or re-utilisation boundary

Articles: Articles 3, 5, 7-9 and 15 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CDSM-04 | Software code reproduction, adaptation, and licence boundary

Articles: Articles 4-7 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU consumer protection acquis

Directives 2005/29/EC, 2011/83/EU, (EU) 2019/770, and 93/13/EEC, as amended

EU-CONS-01 | Unfair, misleading, aggressive, and dark-pattern review

Articles: Articles 5-9, Annex I | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CONS-02 | Consumer-contract, digital-service, and withdrawal information

Articles: Articles 5, 6, 8, 9-16 and 16a | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CONS-03 | Digital-content and digital-service conformity, updates, and remedies

Articles: Articles 5-10, 12-14 and 18-19 | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

EU-CONS-04 | Unfair consumer terms and plain-language contract review

Articles: Articles 3-7, Annex | Applicability: not triggered | Conclusion: not applicable | Evidence lifecycle: not applicable

Evidence: none | Owner: unassigned | Counsel reference: none

Rationale: The configured trigger was assessed against the fictional recorded scope and was not present.

Specialist routing perimeter

Each row records assessed routing for the frozen scope. It does not determine whether a specialist regime legally applies or whether the product complies.

financial_services | Financial services, payments, credit, crypto-assets, and AML | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Digital Operational Resilience Act, Markets in Crypto-assets Regulation, Consumer Credit Directive, Anti-money-laundering Regulation

health_medical | Health data, medical devices, and in-vitro diagnostics | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: European Health Data Space Regulation, Medical Devices Regulation, In Vitro Diagnostic Medical Devices Regulation

employment_algorithmic_management | Employment, equality, and algorithmic management | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Employment Equality Framework Directive, Equal Treatment Directive, Platform Work Directive

connected_products_machinery | Connected consumer products and machinery | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: General Product Safety Regulation, Machinery Regulation

cybersecurity_certification | EU cybersecurity certification | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Cybersecurity Act

trust_services_eudi | Electronic identification, trust services, and EU Digital Identity | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: European Digital Identity Framework

platforms_media_advertising | Platforms, gatekeepers, media, audiovisual, and advertising | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Platform-to-Business Regulation, Digital Markets Act, Political Advertising Regulation, Audiovisual Media Services Directive, European Media Freedom Act

public_sector_law_enforcement | Public sector, procurement, accessibility, and law enforcement | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: EU institutions data-protection Regulation, Law Enforcement Directive, Public Procurement Directive, Web Accessibility Directive

data_intermediation_public_data | Data intermediation, public-sector data, and data movement | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Data Governance Act, Open Data Directive, Free Flow of Non-Personal Data Regulation

critical_infrastructure | Critical-entity resilience | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Critical Entities Resilience Directive

export_dual_use | Export controls and dual-use technology | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Dual-use Regulation

competition_market_conduct | Competition, distribution, and market conduct | Not triggered

Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. |

Evidence: none | Specialist reference: none

Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

Official sources: Treaty on the Functioning of the EU, Article 101, Treaty on the Functioning of the EU, Article 102

Evidence gaps and counsel gates

- EU-AIA-01 / evidence gap: EU-AIA-01 is mapped with a bounded evidence action owned by Product owner.

Article 50 evidence matrix

Operator-reviewed obligation-by-surface evidence record. These evidence states support truthful operational handoff and are not a legal-compliance conclusion.

Article 50 operational gate passed: yes | Control evidence ready: no | Governance context ready: no

Assessed: 2026-07-31T12:00:00.000Z | Source review date: 2026-07-31

Rows: 5/5 | Met: 0 | Gaps: 0 | Uncertain: 5 | Marking tests: 0/0 passing | Data-protection reviews: 1/1 | Disclosure branches: 2/2 | Governance contexts: 3/3

Amended Article 50 operating context

Application and transition: open | Article 50 applies 2026-08-02 | Article 50(2) legacy transition ends 2026-12-02 | System entry event not recorded | System entry date not recorded | Evidence none.

Transition rationale: The system entry date and any Article 50(2) legacy transition have not been evidenced.

Implementation route: open | Evidence state open | Reference none | Evidence none.

Article 50(6) adjacent-law handoff: open | Regimes none identified | Counsel none | Evidence none.

Implementation boundary: Code of Practice adherence or alternative adequate means do not upgrade any obligation row, marking test, disclosure branch, or evidence lifecycle state.

SRF-01 | Article 50(1) | uncertain | uncertain | open

Rationale: Applicability and the current control state require operator review against the frozen workflow and accepted evidence.

Guideline paragraphs: 30 | Evidence: none | Exception: none | Marking tests: none

Open item (high): Article 50(1) has not yet been evidenced for this surface. | Owner: Product owner | Next: Inspect the current production state, link accepted evidence, and record a bounded conclusion.

SRF-01 | Article 50(2) | uncertain | uncertain | open

Rationale: Applicability and the current control state require operator review against the frozen workflow and accepted evidence.

Guideline paragraphs: 54 | Evidence: none | Exception: none | Marking tests: none

Open item (high): Article 50(2) has not yet been evidenced for this surface. | Owner: Product owner | Next: Inspect the current production state, link accepted evidence, and record a bounded conclusion.

SRF-01 | Article 50(3) | uncertain | uncertain | open

Rationale: Applicability and the current control state require operator review against the frozen workflow and accepted evidence.

Guideline paragraphs: 99 | Evidence: none | Exception: none | Marking tests: none

Open item (medium): Article 50(3) has not yet been evidenced for this surface. | Owner: Product owner | Next: Inspect the current production state, link accepted evidence, and record a bounded conclusion.

Article 50(3) data-protection context: open | Frameworks not identified | Counsel none | Evidence none | Rationale The legacy matrix did not separately record the applicable data-protection framework or handoff.

SRF-01 | Article 50(4) | uncertain | uncertain | open

Rationale: Applicability and the current control state require operator review against the frozen workflow and accepted evidence.

Guideline paragraphs: 111 | Evidence: none | Exception: none | Marking tests: none

Open item (medium): Article 50(4) has not yet been evidenced for this surface. | Owner: Product owner | Next: Inspect the current production state, link accepted evidence, and record a bounded conclusion.

Article 50(4) deepfake branch: uncertain | uncertain | open | Disclosure mode open | Evidence none | Exception none | Rationale The legacy matrix did not separately assess the deepfake disclosure branch.

Article 50(4) public interest text branch: uncertain | uncertain | open | Disclosure mode open | Evidence none | Exception none | Human review or editorial control uncertain | Editorial responsibility uncertain / no named party | Rationale The legacy matrix did not

separately assess the public-interest text disclosure branch.

SRF-01 | Article 50(5) | uncertain | uncertain | open

Rationale: Applicability and the current control state require operator review against the frozen workflow and accepted evidence.

Guideline paragraphs: 141 | Evidence: none | Exception: none | Marking tests: none

Open item (medium): Article 50(5) has not yet been evidenced for this surface. | Owner: Product owner | Next: Inspect the current production state, link accepted evidence, and record a bounded conclusion.

Article 50(5) delivery proof - Clear and distinguishable presentation: uncertain | open | Evidence none | Rationale The legacy matrix did not separately evidence whether the disclosure was clear and distinguishable. | Open item Article 50(5) clear and distinguishable proof has not been separately assessed. | Owner Product owner | Next Capture the production disclosure and link evidence showing that people can clearly distinguish it.

Article 50(5) delivery proof - First-interaction or first-exposure timing: uncertain | open | Evidence none | Rationale The legacy matrix did not separately evidence whether the disclosure was present at the first interaction or exposure. | Open item Article 50(5) present at the first interaction or exposure proof has not been separately assessed. | Owner Product owner | Next Capture the first interaction or exposure and link evidence of the disclosure timing.

Article 50(5) delivery proof - Accessibility: uncertain | open | Evidence none | Rationale The legacy matrix did not separately evidence whether the disclosure was accessible. | Open item Article 50(5) accessible proof has not been separately assessed. | Owner Product owner | Next Complete the relevant accessibility review or test and link its evidence.

Article 50(4) branch boundaries

- The artistic, creative, satirical, fictional, or analogous deepfake route remains an applicable limited-disclosure duty; it is never full not applicable on that basis.
- A law-enforcement exception may apply to either branch only with a matching branch-specific decision, evidence, safeguards, and counsel basis.
- The public-interest text editorial route requires substantive human review or editorial control and a named natural or legal person holding editorial responsibility.

Governance findings

- gap / transition: Application timing remains open. Article 50 applies from 2026-08-02; the Article 50(2) legacy transition ends 2026-12-02.
- gap / implementation route: Code of Practice adherence or alternative adequate means have not been evidenced.
- gap / adjacent law handoff: Adjacent Union and national transparency duties have not been bounded.
- gap / data protection review: The applicable data-protection framework has not been bounded.

Exception decisions

No exception decision is recorded.

Executed marking tests

No executed marking test is recorded.

01 | role_scope_map

Role and scope map

Freeze the reviewed product workflow, record working role allocations, and isolate facts that need counsel confirmation.

Frozen scope

- Organization: Northstar Support Labs
- Product: NovaChat Customer Assistant
- Version or release: Web release 3.8.0
- Workflow: Enterprise customer-support workflow
- Workflow summary: A fictional customer-facing assistant answers product questions and can transfer the conversation to a human support agent.
- Target markets: European Union
- Intended users: Enterprise customer support users
- Output types: text
- Review date: 2026-07-31

Working role map

Role | Party category | Status | Basis | Linked evidence

provider | customer organization | working assumption | The fictional customer presents the assistant under its product name. | EV-001

Reported system behaviour

Operational fact | Intake status

direct interaction | Reported yes

generates or manipulates content | Reported yes

biometric categorisation | Reported no

emotion recognition | Reported no

deepfake like media | Reported no

public interest text | Reported no

Amended Article 50 operating context

- Application and transition route: open. Article 50 applies from 2026-08-02; the limited Article 50(2) legacy transition ends 2026-12-02. System entry event: not recorded. System entry date: Not supplied. Evidence: None linked.
- Transition rationale: The system entry date and any Article 50(2) legacy transition have not been evidenced.
- Implementation route: open; evidence lifecycle open; reference Not supplied; evidence None linked.
- Implementation-route rationale: No Code of Practice or alternative adequate-means implementation route was recorded in version 1.0.
- Article 50(6) adjacent-law handoff: open; regimes None identified; counsel reference Not supplied; evidence None linked.
- Adjacent-law rationale: The legacy matrix did not separately record the Article 50(6) adjacent-law review or handoff.
- Control boundary: A recorded Code of Practice or alternative-measures route is implementation context only.

It does not upgrade an obligation row, marking test, disclosure branch, or evidence lifecycle status.

Conditional EU regulatory evidence perimeter

- Configured catalog assessment: 39/39 configured catalog rows assessed for the recorded scope. This is operational evidence mapping, not complete coverage of EU law or a legal-compliance conclusion.
- Specialist routing assessment: 12/12 specialist routing families assessed for the recorded scope. Each disposition is routing only, not a legal-applicability conclusion.
- Catalog: eu-core-2026-07-31-v3; source review 2026-07-31; snapshot b6f313d3da71b2a849b45e5eea68cf48706d3c2607924142c1f70a78ec719cb0; freshness gate current.
- Mapped coverage: controls 39/39; specialist routes 12/12; release gate ready; evidence ready no; counsel decisions open 0; specialist reviews open 0.
- EU Artificial Intelligence Act: 7 control clusters; 1 triggered; 0 counsel-gated; 1 evidence gaps; 0 unknown.
- General Data Protection Regulation: 6 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- e-Commerce Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Digital Services Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Data Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Trade Secrets Directive: 1 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- NIS2 Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Cyber Resilience Act: 3 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Product Liability Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- European Accessibility Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- ePrivacy Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- EU copyright, software, and database rights: 4 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- EU consumer protection acquis: 4 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.

Specialist routing perimeter

- Financial services, payments, credit, crypto-assets, and AML: Not triggered; evidence none linked; official sources Digital Operational Resilience Act, Markets in Crypto-assets Regulation, Consumer Credit Directive, Anti-money-laundering Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Health data, medical devices, and in-vitro diagnostics: Not triggered; evidence none linked; official sources European Health Data Space Regulation, Medical Devices Regulation, In Vitro Diagnostic Medical Devices Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Employment, equality, and algorithmic management: Not triggered; evidence none linked; official sources Employment Equality Framework Directive, Equal Treatment Directive, Platform Work Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Connected consumer products and machinery: Not triggered; evidence none linked; official sources General Product Safety Regulation, Machinery Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- EU cybersecurity certification: Not triggered; evidence none linked; official sources Cybersecurity Act. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not

present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

- Electronic identification, trust services, and EU Digital Identity: Not triggered; evidence none linked; official sources European Digital Identity Framework. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Platforms, gatekeepers, media, audiovisual, and advertising: Not triggered; evidence none linked; official sources Platform-to-Business Regulation, Digital Markets Act, Political Advertising Regulation, Audiovisual Media Services Directive, European Media Freedom Act. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Public sector, procurement, accessibility, and law enforcement: Not triggered; evidence none linked; official sources EU institutions data-protection Regulation, Law Enforcement Directive, Public Procurement Directive, Web Accessibility Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Data intermediation, public-sector data, and data movement: Not triggered; evidence none linked; official sources Data Governance Act, Open Data Directive, Free Flow of Non-Personal Data Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Critical-entity resilience: Not triggered; evidence none linked; official sources Critical Entities Resilience Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Export controls and dual-use technology: Not triggered; evidence none linked; official sources Dual-use Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Competition, distribution, and market conduct: Not triggered; evidence none linked; official sources Treaty on the Functioning of the EU, Article 101, Treaty on the Functioning of the EU, Article 102. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

These 12 rows record assessed routing for the frozen scope. They do not determine whether a specialist regime legally applies or whether the product complies.

Human-review boundary

The map records customer-supplied operational facts, evidence states, and working assumptions. It does not decide a legal role, exception, adjacent-law outcome, or Article 50 outcome.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.

- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: eur_lex_ai_act, eur_lex_ai_omnibus, ec_article_50, ec_article_50_faq, ec_transparency_guidelines

02 | surface_register

Surface register

Maintain a stable inventory of every interaction, output, export, and publication surface inside the frozen workflow.

Scoped surfaces

ID | Surface | Channel | States | Owner role | Current disclosure | Current marking | Confidence | Evidence

SRF-01 | Assistant entry and generated response | web | entry, first interaction, active interaction, generated output, copy | Product | AI assistant | Not supplied | confirmed | EV-001

Review instructions

- Verify each surface in the current production release.
- Capture the first exposure, active interaction, output, copy, export, publication, and handoff states that apply.
- Replace every reported or unknown field with timestamped evidence before delivery.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: `ec_transparency_guidelines`, `ec_article_50`

03 | disclosure_pack

Disclosure pack

Give product and content teams reviewable disclosure copy with placement, timing, persistence, accessibility, approval, and evidence requirements.

Draft disclosure specifications

SRF-01 - Assistant entry and generated response

- Customer-reported current notice: AI assistant
- Draft working copy: You are interacting with an AI system. Review important outputs before relying on them.
- Trigger and timing: Before the first relevant interaction or exposure on this surface; confirm against the actual user journey.
- Placement and persistence: Adjacent to the relevant interaction or output and available for as long as the context requires; product review required.
- Presentation: Use plain language, keyboard-accessible placement, and a format available to the intended user.
- Approval: Product owner and qualified human reviewer.
- Evidence to retain: Current-release capture, approved copy, release identifier, surface ID, and approval timestamp.
- Recorded Article 50(4) branches:
 - deepfake: open; uncertain; open.
 - public interest text: open; uncertain; open. Human review or editorial control: uncertain. Editorial responsibility: uncertain, no named party.

Article 50(4) branch rules

- Artistic, creative, satirical, fictional, or analogous deepfake content remains inside the deepfake branch. Where the limited artistic route is supported, disclosure is limited so it does not hamper the display or enjoyment of the work; the branch is never treated as fully not applicable on that basis.
- A law-enforcement exception may apply to either the deepfake branch or the public-interest text branch only when the branch-specific exception decision, evidence, safeguards, and counsel basis are recorded.
- The public-interest text editorial route requires substantive human review or editorial control and a named natural or legal person holding editorial responsibility. A generic human-review label is not enough.
- A Code of Practice route is implementation context only. It does not upgrade a disclosure branch or prove that a control is met.

Approval rule

These are working specifications. The customer must confirm factual accuracy, user context, translations, accessibility, and legal interpretation before release.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.

- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: `ec_transparency_guidelines`, `ec_transparency_quick_facts`, `ec_article_50`, `ec_article_50_faq`, `ec_transparency_code`, `ec_transparency_code_opinion`

04 | marking_test_record

Marking test record

Record repeatable tests of the selected machine-readable marking or provenance method across representative output paths.

Test plan and record

Test ID | Surface or output path | Marking method | Detector | Outcome | Dimension results | Linked evidence | Limitations or evidence required

TST-01 | SRF-01 - Assistant entry and generated response | Method selection remains open | Not recorded | not run - human verification required | not tested | Capture output hash, generation time, delivery path, detector or inspection method, result, limitations, and reviewer. | Not recorded

TST-02 | Representative in-product output | Method selection remains open | Not recorded | not run - human verification required | not tested | Capture output hash, generation time, delivery path, detector or inspection method, result, limitations, and reviewer. | Not recorded

TST-03 | Representative copied output | Method selection remains open | Not recorded | not run - human verification required | not tested | Capture output hash, generation time, delivery path, detector or inspection method, result, limitations, and reviewer. | Not recorded

Repeatable procedure

1. Generate a fresh representative output in the reviewed release.
2. Record the output hash, model or service version, release identifier, and timestamp.
3. Exercise the complete copy, export, or publication path.
4. Run the agreed detector or inspection method and preserve its version and raw result.
5. Record false-negative risks, transformations, and any path where the signal is lost.
6. Obtain human review and link the retained test evidence.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: [eur_lex_ai_act](#), [eur_lex_ai_omnibus](#), [ec_transparency_guidelines](#), [ec_article_50](#), [ec_article_50_faq](#), [ec_transparency_code](#), [ec_transparency_code_opinion](#)

05 | gap_decision_register

Gap and decision register

Separate observed product, engineering, content, evidence, and counsel decisions into source-linked, owned actions.

Open gaps and decisions

ID | Priority | Category | Surface | Finding | Required action | Owner role | Status | Review date

GAP-01 | P1 | Evidence | WORKFLOW | EU-AIA-01 - Role, territory, and system-scope classification is evidence gap | Confirm the recorded supply-chain role against the product facts and contract. | Trust | Open | 2026-07-31

GAP-02 | P0 | Engineering | SRF-01 | Marking method is not evidenced for Assistant entry and generated response | Select or confirm the technical method, run the end-to-end test plan, and retain the result with limitations. | Product | Open | 2026-07-31

GAP-03 | P0 | Counsel | ALL | Article 50 application timing remains open | Record the first placement or putting-into-service date and link the supporting release record. | Legal | Open | 2026-07-31

GAP-04 | P1 | Evidence | ALL | Implementation route is not evidenced | Record Code of Practice adherence or the alternative adequate means used, then link the current evidence. | Trust | Open | 2026-07-31

GAP-05 | P1 | Counsel | ALL | Article 50(6) adjacent-law review needs closure | Identify relevant regimes and record either a bounded review or a named counsel handoff. | Legal | Open | 2026-07-31

GAP-06 | P0 | Counsel | SRF-01 | Article 50(3) data-protection route is open | Identify the applicable data-protection framework, link the reviewed record, and record any counsel handoff. | Legal | Open | 2026-07-31

GAP-07 | P0 | Evidence | SRF-01 | deepfake disclosure branch remains uncertain | Assess the deepfake branch, link source evidence, and record any branch-specific exception decision. | Content | Open | 2026-07-31

GAP-08 | P0 | Evidence | SRF-01 | public interest text disclosure branch remains uncertain | Assess publication purpose and editorial responsibility, link source evidence, and record any branch-specific exception decision. | Trust | Open | 2026-07-31

GAP-09 | P0 | Evidence | SRF-01 | Article 50(1) has not yet been evidenced for this surface. | Owner recorded in matrix: Product owner. Inspect the current production state, link accepted evidence, and record a bounded conclusion. | Trust | Open | 2026-07-31

GAP-10 | P0 | Engineering | SRF-01 | Article 50(2) has not yet been evidenced for this surface. | Owner recorded in matrix: Product owner. Inspect the current production state, link accepted evidence, and record a bounded conclusion. | Engineering | Open | 2026-07-31

GAP-11 | P1 | Evidence | SRF-01 | Article 50(3) has not yet been evidenced for this surface. | Owner recorded in matrix: Product owner. Inspect the current production state, link accepted evidence, and record a bounded conclusion. | Trust | Open | 2026-07-31

Priority definitions

- P0: Resolve before the relevant release or enterprise deadline.
- P1: Resolve in the next planned sprint.
- P2: Monitor, document, or improve after release-blocking work.

No row is a definitive finding of legal breach. Status changes require linked verification evidence and human approval.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: eur_lex_ai_act, ec_transparency_guidelines, ec_article_50

06 | implementation_tickets

Implementation tickets

Translate the highest-priority findings into an implementation-ready backlog with objective acceptance and evidence requirements.

Prioritised backlog

FP-001 - EU-AIA-01 - Role, territory, and system-scope classification is evidence gap

- Priority: P1
- Affected surface: WORKFLOW
- Context: Confirm the recorded supply-chain role against the product facts and contract.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Trust

FP-002 - Marking method is not evidenced for Assistant entry and generated response

- Priority: P0
- Affected surface: SRF-01
- Context: Select or confirm the technical method, run the end-to-end test plan, and retain the result with limitations.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Product

FP-003 - Article 50 application timing remains open

- Priority: P0
- Affected surface: ALL
- Context: Record the first placement or putting-into-service date and link the supporting release record.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.

- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Legal

FP-004 - Implementation route is not evidenced

- Priority: P1
- Affected surface: ALL
- Context: Record Code of Practice adherence or the alternative adequate means used, then link the current evidence.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Trust

FP-005 - Article 50(6) adjacent-law review needs closure

- Priority: P1
- Affected surface: ALL
- Context: Identify relevant regimes and record either a bounded review or a named counsel handoff.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Legal

FP-006 - Article 50(3) data-protection route is open

- Priority: P0
- Affected surface: SRF-01
- Context: Identify the applicable data-protection framework, link the reviewed record, and record any counsel handoff.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Legal

FP-007 - deepfake disclosure branch remains uncertain

- Priority: P0

- Affected surface: SRF-01
- Context: Assess the deepfake branch, link source evidence, and record any branch-specific exception decision.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Content

FP-008 - public interest text disclosure branch remains uncertain

- Priority: P0
- Affected surface: SRF-01
- Context: Assess publication purpose and editorial responsibility, link source evidence, and record any branch-specific exception decision.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Trust

FP-009 - Article 50(1) has not yet been evidenced for this surface.

- Priority: P0
- Affected surface: SRF-01
- Context: Owner recorded in matrix: Product owner. Inspect the current production state, link accepted evidence, and record a bounded conclusion.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.
- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Trust

FP-010 - Article 50(2) has not yet been evidenced for this surface.

- Priority: P0
- Affected surface: SRF-01
- Context: Owner recorded in matrix: Product owner. Inspect the current production state, link accepted evidence, and record a bounded conclusion.
- Proposed behaviour: The reviewed surface implements the approved disclosure, marking, or evidence behaviour without obscuring the user context.
- Draft copy: Use the approved entry from the disclosure pack where relevant; otherwise record not applicable.

- Acceptance criteria: A human reviewer repeats the defined current-release check and records a pass, failure, or limitation.
- Evidence to retain: Release identifier, surface ID, timestamped capture or test result, approval record, and reviewer role.
- Owner role: Engineering

Delivery rule

Technical unknowns remain validation work until engineering confirms the actual capability. A ticket closes only when its acceptance criteria and retained evidence have been reviewed.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: [ec_transparency_guidelines](#), [ec_article_50](#)

07 | evidence_index

Evidence index

Version customer evidence and generated artifacts with ownership, storage, verification state, and review dates.

Evidence register

Evidence ID | Artifact | Version | Verification status | Surface | Verified finding or limitation | Storage reference | Last verification

EV-001 | Customer evidence - Fictional assistant entry capture | 3.8.0 | verified | SRF-01 | Fictional evidence used only to demonstrate the delivery format. | Assign secure location | 2026-07-31T12:00:00.000Z

PACK-01 | Role and scope map | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-02 | Surface register | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-03 | Disclosure pack | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-04 | Marking test record | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-05 | Gap and decision register | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-06 | Implementation tickets | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-07 | Evidence index | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-08 | Buyer trust brief | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

PACK-09 | Counsel handoff | Draft 1 | draft requires review | Pack-wide | Human review required | Assign after approval | 2026-07-31

EU regulatory control evidence links

Control ID | Applicability | Conclusion | Evidence lifecycle | Evidence IDs | Owner

EU-AIA-01 | triggered | evidence gap | open | None linked | Product owner

EU-AIA-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-AIA-03 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-AIA-04 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-AIA-05 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-AIA-06 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-AIA-07 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-GDPR-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-GDPR-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-GDPR-03 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-GDPR-04 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-GDPR-05 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-GDPR-06 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-ECOM-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-ECOM-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-DSA-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-DSA-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-DATA-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-DATA-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-TS-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-NIS2-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-NIS2-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-CRA-01 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-CRA-02 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-CRA-03 | not triggered | not applicable | not applicable | None linked | Not supplied

EU-PLD-01 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-PLD-02 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-EAA-01 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-EAA-02 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-EPRIV-01 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-EPRIV-02 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CDSM-01 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CDSM-02 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CDSM-03 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CDSM-04 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CONS-01 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CONS-02 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CONS-03 | not triggered | not applicable | not applicable | None linked | Not supplied
EU-CONS-04 | not triggered | not applicable | not applicable | None linked | Not supplied

The control register preserves full evidence IDs and the exact source-catalog snapshot. A link shows provenance only; it is not a legal-compliance conclusion.

Specialist routing evidence links

Family ID | Routing family | Disposition | Evidence IDs | Specialist reference | Owner | Limitation

financial_services | Financial services, payments, credit, crypto-assets, and AML | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

health_medical | Health data, medical devices, and in-vitro diagnostics | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

employment_algorithmic_management | Employment, equality, and algorithmic management | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

connected_products_machinery | Connected consumer products and machinery | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

cybersecurity_certification | EU cybersecurity certification | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

trust_services_eudi | Electronic identification, trust services, and EU Digital Identity | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

platforms_media_advertising | Platforms, gatekeepers, media, audiovisual, and advertising | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

public_sector_law_enforcement | Public sector, procurement, accessibility, and law enforcement | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

data_intermediation_public_data | Data intermediation, public-sector data, and data movement | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

critical_infrastructure | Critical-entity resilience | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

export_dual_use | Export controls and dual-use technology | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

competition_market_conduct | Competition, distribution, and market conduct | Not triggered | None linked | Not supplied | Not supplied | This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

The specialist register records assessed routing for the frozen scope. It does not determine legal applicability or compliance.

Operating rule

Store only redacted, necessary evidence in the agreed secure channel. Replace placeholders with stable locations, accountable roles, approval timestamps, and the next review date before delivery.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: [ec_transparency_guidelines](#), [ec_article_50](#)

08 | buyer_trust_brief

Buyer trust brief

Give buyer and assurance teams a concise, evidence-bounded explanation of the reviewed workflow, reported controls, open work, and review date.

Product and workflow

Northstar Support Labs supplied information about NovaChat Customer Assistant, limited to Enterprise customer-support workflow across 1 scoped surface. The pack review date is 2026-07-31.

Customer-reported operating facts

- Target markets: European Union
- Intended users: Enterprise customer support users
- Output types: text
- Direct interaction: Reported yes
- Generated or manipulated content: Reported yes

Reported control baseline

- SRF-01 - Assistant entry and generated response: disclosure reported; no marking control reported.

Operator-reviewed Article 50 evidence matrix

- SRF-01 / Article 50(1): uncertain, uncertain, evidence status open; guideline paragraphs 30.
- SRF-01 / Article 50(2): uncertain, uncertain, evidence status open; guideline paragraphs 54.
- SRF-01 / Article 50(3): uncertain, uncertain, evidence status open; guideline paragraphs 99. Article 50(3) data-protection context: open; frameworks not identified.
- SRF-01 / Article 50(4): uncertain, uncertain, evidence status open; guideline paragraphs 111. Article 50(4) branches: deepfake=open/uncertain/open; public interest text=open/uncertain/open.
- SRF-01 / Article 50(5): uncertain, uncertain, evidence status open; guideline paragraphs 141.

Conditional EU regulatory evidence perimeter

- Configured catalog assessment: 39/39 configured catalog rows assessed for the recorded scope. This is operational evidence mapping, not complete coverage of EU law or a legal-compliance conclusion.
- Specialist routing assessment: 12/12 specialist routing families assessed for the recorded scope. Each disposition is routing only, not a legal-applicability conclusion.
- Catalog: eu-core-2026-07-31-v3; source review 2026-07-31; snapshot b6f313d3da71b2a849b45e5eea68cf48706d3c2607924142c1f70a78ec719cb0; freshness gate current.
- Mapped coverage: controls 39/39; specialist routes 12/12; release gate ready; evidence ready no; counsel decisions open 0; specialist reviews open 0.
- EU Artificial Intelligence Act: 7 control clusters; 1 triggered; 0 counsel-gated; 1 evidence gaps; 0 unknown.
- General Data Protection Regulation: 6 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- e-Commerce Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.

- Digital Services Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Data Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Trade Secrets Directive: 1 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- NIS2 Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Cyber Resilience Act: 3 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Product Liability Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- European Accessibility Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- ePrivacy Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- EU copyright, software, and database rights: 4 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- EU consumer protection acquis: 4 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.

Specialist routing perimeter

- Financial services, payments, credit, crypto-assets, and AML: Not triggered; evidence none linked; official sources Digital Operational Resilience Act, Markets in Crypto-assets Regulation, Consumer Credit Directive, Anti-money-laundering Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Health data, medical devices, and in-vitro diagnostics: Not triggered; evidence none linked; official sources European Health Data Space Regulation, Medical Devices Regulation, In Vitro Diagnostic Medical Devices Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Employment, equality, and algorithmic management: Not triggered; evidence none linked; official sources Employment Equality Framework Directive, Equal Treatment Directive, Platform Work Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Connected consumer products and machinery: Not triggered; evidence none linked; official sources General Product Safety Regulation, Machinery Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- EU cybersecurity certification: Not triggered; evidence none linked; official sources Cybersecurity Act. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Electronic identification, trust services, and EU Digital Identity: Not triggered; evidence none linked; official sources European Digital Identity Framework. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Platforms, gatekeepers, media, audiovisual, and advertising: Not triggered; evidence none linked; official sources Platform-to-Business Regulation, Digital Markets Act, Political Advertising Regulation, Audiovisual Media Services Directive, European Media Freedom Act. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Public sector, procurement, accessibility, and law enforcement: Not triggered; evidence none linked; official sources EU institutions data-protection Regulation, Law Enforcement Directive, Public Procurement Directive, Web Accessibility Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Data intermediation, public-sector data, and data movement: Not triggered; evidence none linked; official

sources Data Governance Act, Open Data Directive, Free Flow of Non-Personal Data Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

- Critical-entity resilience: Not triggered; evidence none linked; official sources Critical Entities Resilience Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

- Export controls and dual-use technology: Not triggered; evidence none linked; official sources Dual-use Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

- Competition, distribution, and market conduct: Not triggered; evidence none linked; official sources Treaty on the Functioning of the EU, Article 101, Treaty on the Functioning of the EU, Article 102. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

These 12 rows record assessed routing for the frozen scope. They do not determine whether a specialist regime legally applies or whether the product complies.

Amended Article 50 operating context

- Application and transition route: open. Article 50 applies from 2026-08-02; the limited Article 50(2) legacy transition ends 2026-12-02. System entry event: not recorded. System entry date: Not supplied. Evidence: None linked.

- Transition rationale: The system entry date and any Article 50(2) legacy transition have not been evidenced.

- Implementation route: open; evidence lifecycle open; reference Not supplied; evidence None linked.

- Implementation-route rationale: No Code of Practice or alternative adequate-means implementation route was recorded in version 1.0.

- Article 50(6) adjacent-law handoff: open; regimes None identified; counsel reference Not supplied; evidence None linked.

- Adjacent-law rationale: The legacy matrix did not separately record the Article 50(6) adjacent-law review or handoff.

- Control boundary: A recorded Code of Practice or alternative-measures route is implementation context only. It does not upgrade an obligation row, marking test, disclosure branch, or evidence lifecycle status.

Article 50(3) data-protection context

- SRF-01: open; frameworks not identified; counsel reference Not supplied; evidence none linked. Rationale: The legacy matrix did not separately record the applicable data-protection framework or handoff.

Article 50(4) disclosure branches

- SRF-01 / deepfake: uncertain, uncertain, evidence lifecycle open, disclosure mode open; exception decision none recorded; evidence none linked. Rationale: The legacy matrix did not separately assess the deepfake disclosure branch.

- SRF-01 / public interest text: uncertain, uncertain, evidence lifecycle open, disclosure mode open; exception decision none recorded; evidence none linked. Human review or editorial control: uncertain. Editorial responsibility: uncertain, no named party. Rationale: The legacy matrix did not separately assess the public-interest text disclosure branch.

The artistic deepfake route limits how disclosure is presented; it does not make that branch fully not applicable. A

law-enforcement exception may be assessed on either Article 50(4) branch. The public-interest text editorial route requires substantive human review or editorial control and a named person holding editorial responsibility.

Verified evidence available to this draft

- Fictional assistant entry capture - Fictional evidence used only to demonstrate the delivery format.

Open items

- P1 - EU-AIA-01 - Role, territory, and system-scope classification is evidence gap
- P0 - Marking method is not evidenced for Assistant entry and generated response
- P0 - Article 50 application timing remains open
- P1 - Implementation route is not evidenced
- P1 - Article 50(6) adjacent-law review needs closure
- P0 - Article 50(3) data-protection route is open
- P0 - deepfake disclosure branch remains uncertain
- P0 - public interest text disclosure branch remains uncertain

Assurance boundary

This brief is an operational draft based on the frozen workflow and supplied evidence. It is not a certification, legal opinion, regulator decision, or guarantee of a particular outcome. External answer blocks require customer approval and a current source check.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.
- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: `eur_lex_ai_act`, `eur_lex_ai_omnibus`, `ec_transparency_guidelines`, `ec_transparency_quick_facts`, `ec_article_50`, `ec_article_50_faq`, `ec_transparency_code`, `ec_transparency_code_opinion`

09 | [counsel_handoff](#)

Counsel handoff

Keep legal interpretation questions separate from product implementation and evidence tasks so counsel can answer a bounded factual record.

Frozen factual context

- Product: NovaChat Customer Assistant
- Workflow: Enterprise customer-support workflow
- Markets: European Union
- Surfaces reviewed: SRF-01
- Review date: 2026-07-31

Amended Article 50 operating context

- Application and transition route: open. Article 50 applies from 2026-08-02; the limited Article 50(2) legacy transition ends 2026-12-02. System entry event: not recorded. System entry date: Not supplied. Evidence: None linked.
- Transition rationale: The system entry date and any Article 50(2) legacy transition have not been evidenced.
- Implementation route: open; evidence lifecycle open; reference Not supplied; evidence None linked.
- Implementation-route rationale: No Code of Practice or alternative adequate-means implementation route was recorded in version 1.0.
- Article 50(6) adjacent-law handoff: open; regimes None identified; counsel reference Not supplied; evidence None linked.
- Adjacent-law rationale: The legacy matrix did not separately record the Article 50(6) adjacent-law review or handoff.
- Control boundary: A recorded Code of Practice or alternative-measures route is implementation context only. It does not upgrade an obligation row, marking test, disclosure branch, or evidence lifecycle status.

Wider EU regulatory evidence perimeter

- Configured catalog assessment: 39/39 configured catalog rows assessed for the recorded scope. This is operational evidence mapping, not complete coverage of EU law or a legal-compliance conclusion.
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- Catalog: eu-core-2026-07-31-v3; source review 2026-07-31; snapshot b6f313d3da71b2a849b45e5eea68cf48706d3c2607924142c1f70a78ec719cb0; freshness gate current.
- Mapped coverage: controls 39/39; specialist routes 12/12; release gate ready; evidence ready no; counsel decisions open 0; specialist reviews open 0.
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- e-Commerce Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Digital Services Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Data Act: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
- Trade Secrets Directive: 1 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.

- NIS2 Directive: 2 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
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- EU copyright, software, and database rights: 4 control clusters; 0 triggered; 0 counsel-gated; 0 evidence gaps; 0 unknown.
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Specialist routing perimeter

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- Health data, medical devices, and in-vitro diagnostics: Not triggered; evidence none linked; official sources European Health Data Space Regulation, Medical Devices Regulation, In Vitro Diagnostic Medical Devices Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Employment, equality, and algorithmic management: Not triggered; evidence none linked; official sources Employment Equality Framework Directive, Equal Treatment Directive, Platform Work Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
- Connected consumer products and machinery: Not triggered; evidence none linked; official sources General Product Safety Regulation, Machinery Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
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- Electronic identification, trust services, and EU Digital Identity: Not triggered; evidence none linked; official sources European Digital Identity Framework. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
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- Data intermediation, public-sector data, and data movement: Not triggered; evidence none linked; official sources Data Governance Act, Open Data Directive, Free Flow of Non-Personal Data Regulation. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

or compliance conclusion.

- Critical-entity resilience: Not triggered; evidence none linked; official sources Critical Entities Resilience Directive. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.
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- Competition, distribution, and market conduct: Not triggered; evidence none linked; official sources Treaty on the Functioning of the EU, Article 101, Treaty on the Functioning of the EU, Article 102. Rationale: The specialist trigger was assessed against the fictional customer-support scope and was not present in the recorded facts. Limitation: This is a bounded routing disposition for the fictional scope, not a legal-applicability or compliance conclusion.

These 12 rows record assessed routing for the frozen scope. They do not determine whether a specialist regime legally applies or whether the product complies.

Role-allocation questions

- Confirm the provider allocation currently recorded as working assumption. Basis supplied: The fictional customer presents the assistant under its product name.

Interpretation questions

- Confirm the Article 50(3) data-protection route for SRF-01: status open, frameworks not identified, rationale The legacy matrix did not separately record the applicable data-protection framework or handoff..

The law-enforcement exception can be assessed against either Article 50(4) branch, but must be branch-specific, evidence-linked, safeguard-bounded, and counsel-supported. The Code of Practice route never proves a control or changes an evidence lifecycle state.

Open counsel decisions from the register

- Article 50 application timing remains open
- Article 50(6) adjacent-law review needs closure
- Article 50(3) data-protection route is open

Requested answer format

For each question, record the decision, factual assumptions relied on, official source ID, approver role, decision date, and trigger for re-review. Do not hide unresolved facts inside a buyer-facing answer.

Assumptions and review points

- Customer-supplied facts remain subject to verification against the referenced evidence.
- Final role allocation, exceptions, territorial scope, and legal interpretation require qualified human review.
- Every proposed control and answer block remains a draft until the accountable customer owner approves it.
- provider role: The fictional customer presents the assistant under its product name. (working assumption).
- The Article 50 application and Article 50(2) legacy-transition route remains open.
- The Code of Practice or alternative adequate-means implementation route remains open.

- The Article 50(6) adjacent Union or national transparency-law review remains open or handed off.
- The mapped EU regulatory perimeter contains bounded evidence gaps or open counsel or specialist decisions.

Catalogued official reference IDs: `eur_lex_ai_act`, `eur_lex_ai_omnibus`, `ec_article_50`, `ec_article_50_faq`, `ec_transparency_guidelines`, `ec_transparency_code`, `ec_transparency_code_opinion`

Official-source boundary

Source metadata was reviewed on 2026-07-31. Re-check the official materials before a material release or external assurance statement.

This PDF lists only catalogued official reference IDs and titles. Source URLs are intentionally omitted; the canonical URLs remain in the validated JSON and HTML exports.

ec_transparency_guidelines | European Commission guidelines on transparency obligations for providers and deployers of AI systems

ec_transparency_quick_facts | European Commission quick facts on transparency rules for AI systems

eur_lex_ai_act | Regulation (EU) 2024/1689, Official Journal text

ec_article_50 | European Commission AI Act Service Desk - Article 50

eur_lex_ai_omnibus | Regulation (EU) 2026/1744, Digital Omnibus on AI, Official Journal text

ec_article_50_faq | European Commission questions and answers on Article 50 transparency obligations

ec_transparency_code | European Commission Code of Practice on Transparency of AI-Generated Content

ec_transparency_code_opinion | Commission Opinion on the Code of Practice on Transparency of AI-Generated Content

Human review status: draft requires review.