

# AI TRANSPARENCY NOTICE

Velvoite.eu

Last Updated: March 2026 | Version 2.0

*This notice explains how Velvoite.eu uses artificial intelligence in our services, in compliance with the EU AI Act (Regulation 2024/1689).*

## 1. About Our AI Systems

Velvoite.eu uses AI to help you monitor and understand EU financial regulatory requirements. Our AI systems:

- Extract compliance obligations from regulatory documents published by EUR-Lex, EBA, ESMA, FIN-FSA, EIOPA, and BaFin
- Generate summaries of regulatory documents for quick reference
- Classify documents by regulation family, applicable entity type, and urgency level
- Enable semantic search across the regulatory corpus to find relevant requirements

## 2. Designated AI Oversight Person

**NEW in v2.0** — In accordance with Article 26(2) of the EU AI Act, Silly Pilot Oy has designated a natural person responsible for human oversight of our AI systems.

| Field            | Value  |
|------------------|--|
| Name             | Matti Puhakka  |
| Role             | CEO & Designated AI Oversight Person   |
| Organisation     | Silly Pilot Oy   |
| Contact          | compliance@velvoite.eu   |
| Responsibilities | Oversight of AI system operation, monitoring of AI output quality, authority to suspend AI processing, point of contact for AI Act inquiries |

The designated AI oversight person has the competence, training, and authority necessary to exercise effective oversight of the AI systems deployed by Velvoite.eu, including the

authority to suspend AI processing if outputs are found to be materially inaccurate or harmful.

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### 3. What This Means for You

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#### 3.1 AI-Generated Content

When you use our platform, you will see content generated by AI, including:

- Document summaries and key takeaway extractions
- Structured compliance obligations extracted from regulatory texts
- Document classifications (regulation family, entity type, urgency)
- Search results ranked by semantic relevance

All AI-generated content is clearly labelled in our interface.

#### 3.2 Three-Layer Answer Approach

For every piece of AI-processed information, Velvoite.eu provides:

- **AI Summary** — A concise, AI-generated overview of the content
- **Verbatim Legal Text** — The original regulatory text as published by the source authority
- **Source Reference** — A clickable link to the original document at the official source

#### 3.3 Human Oversight

Our AI provides information, not legal advice. You always have:

- Final decision-making authority over your compliance activities
  - The ability to review original source documents for any AI output
  - Access to verbatim regulatory text alongside AI summaries
  - The responsibility to consult qualified legal professionals for compliance decisions
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## 4. Machine-Readable AI Content Marking

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**NEW in v2.0** — In accordance with Article 50(2) of the EU AI Act, AI-generated content from Velvoite.eu is marked as such in both human-readable and machine-readable formats.

## 4.1 Human-Readable Marking

All AI-generated content in the web application is visually labelled with: - “AI Summary” badges on document summaries - “AI-Extracted” indicators on obligation text - “AI-Classified” markers on document classification tags - Clear visual distinction between AI-generated summaries and verbatim legal text

## 4.2 Machine-Readable Marking (API and MCP)

For customers integrating via our REST API or MCP server, AI-generated content is identified through structured metadata:

| Field                          | Values   | Description   |
|--------------------------------|--|---|
| <code>extraction_method</code> | <code>verbatim_extract</code> / <code>ai_paraphrase</code> | Per-obligation marker indicating whether source text is a direct quote or AI-paraphrased. Returned on <code>/obligations</code> , <code>/documents/{id}</code> , and <code>/deadlines</code> endpoints. |
| <code>ai_processed</code>      | <code>true</code> / <code>false</code>                     | Boolean on document responses indicating whether AI classification and summarisation has been applied   |
| <code>document_url</code>      | URL  | Link to the original regulatory document at the official source (on obligation responses)   |
| <code>url</code>               | URL  | Link to the original regulatory document (on document responses)  |
| <code>source_text</code>       | string   | Verbatim quote from the source regulation (authoritative text)  |
| <code>obligation_text</code>   | string   | AI-generated plain-language summary (labelled as AI output)   |

**Technical note:** The `extraction_method` field is set to `verbatim_extract` for all current obligations, meaning the `source_text` field contains an exact quote from the regulation. The `obligation_text` field is always AI-generated and is marked accordingly. The `ai_processed` field on documents indicates whether the document has been through AI classification and summarisation.

### 4.3 Email Digest Marking

AI-generated content in email digests (daily, weekly, monthly) includes: - “AI Summary” label prefixing all AI-generated text - Source document links for verification - Footer disclaimer identifying AI-generated content

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## 5. AI Technologies We Use

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We integrate AI models from Google:

| Provider                | Use in Our Platform   |
|-------------------------|---|
| Google Gemini Flash     | Regulatory document extraction, summarisation, and classification |
| Google Gemini Embedding | Semantic search across the regulatory document corpus             |

These providers are subject to EU AI Act obligations for General Purpose AI models (Articles 53-55).

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## 6. How Your Data is Used with AI

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Important information about your data and our AI:

- AI processes **publicly available regulatory documents** — not your proprietary business data
  - Your account data (name, email, company) is NOT processed by AI models
  - Your search queries may be sent to AI providers for semantic processing
  - Your data is NOT used to train AI models
  - You can export or delete your account data at any time
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## 7. AI Limitations

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AI systems have limitations. Our AI:

- May not extract all obligations from complex regulatory documents
- Cannot guarantee the completeness or accuracy of all extractions and summaries
- May produce different summaries for the same document across processing runs
- Should be used as one input among many in your compliance activities

- Does NOT constitute legal advice — consult qualified professionals for compliance decisions
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## 8. Operational Monitoring

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**NEW in v2.0** — In accordance with Article 26(5) of the EU AI Act, Velvoite.eu maintains an operational monitoring procedure for its AI systems.

Velvoite.eu continuously monitors the quality and accuracy of its AI outputs through:

- **Automated quality audits** — Regular checks on extraction accuracy, classification consistency, and obligation completeness
- **Human verification programme** — Sample-based human review of AI-extracted obligations, tracked via verification statistics
- **Anomaly detection** — Monitoring for unusual patterns in AI output (e.g., spike in empty extractions, classification drift)
- **Suspension authority** — The designated AI oversight person has the authority to immediately suspend AI processing for any system producing materially inaccurate results

If AI processing is suspended, affected outputs are flagged and users are notified. Details of our monitoring and incident response procedures are maintained in our internal AI Quality Management System.

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## 9. Important Disclaimer

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**Velvoite.eu is a regulatory information monitoring tool. It is NOT a legal advisory service.**

AI-generated summaries, obligation extractions, and classifications are provided for informational purposes only. They should not be relied upon as legal advice or as a substitute for professional compliance guidance. Users should always verify information against original regulatory sources and consult qualified legal professionals for compliance decisions.

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## 10. Your Rights

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Under the EU AI Act, you have the right to:

- Be informed when content is AI-generated (this notice fulfils this)
  - Know who is responsible for AI oversight (Section 2 above)
  - Request explanation of AI-assisted processing affecting you
  - Lodge complaints about AI systems to market surveillance authorities
  - Access original source documents for any AI-generated content
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## 11. Contact Us

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|---------------------|---|
| AI Oversight Person | Matti Puhakka (compliance@velvoite.eu)                |
| General inquiries   | info@velvoite.eu                                      |
| Website             | <a href="https://velvoite.eu">https://velvoite.eu</a> |
| Company             | Silly Pilot Oy (3572343-6)                            |
| Location            | Espoo, Finland  |

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## 12. Updates to This Notice

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We will update this notice when we make significant changes to our AI systems or when required by regulatory guidance. The “Last Updated” date at the top indicates when changes were made.

| Version | Date          | Summary of Changes   |
|---------|---------------|--|
| 1.0     | February 2026 | Initial notice   |
| 2.0     | March 2026    | Added designated AI oversight person (Art. 26(2)); added machine-readable AI content marking (Art. 50(2)); added operational monitoring section (Art. 26(5)); updated source list (added EIOPA, BaFin) |

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