

Brightfjord Software AB

DEMO

10 October 2026 · Prepared by DATADEFENZ

This is a demonstration report. Brightfjord Software AB is a fictional company created to show the structure and depth of a DATADEFENZ EU AI Act readiness assessment. The systems, findings, owners and dates are illustrative. No client data appears in this document. The legal content — articles, annexes, deadlines, reporting clocks and penalties — is real and is the same content used in live engagements.

This report is based on information provided by the organisation and on the regulatory sources available to the assessor: Regulation (EU) 2024/1689 (the AI Act) as amended by Regulation (EU) 2026/1744 (the AI Omnibus), and official Commission guidance. Conclusions are potentially applicable and require legal validation. It does not constitute legal advice.

1. Executive summary

We identified **4 AI systems** in scope of the EU AI Act, and no general-purpose AI models placed on the market by the organisation. They fall into these buckets:

- **1 high-risk AI system:** TalentRank — applicant screening
- **3 normal AI systems:** Microsoft 365 Copilot, Brighty — customer support chatbot, CRM churn prediction

14% Overall compliance 48 requirement rows · 42% assessed	15% Already applicable 31 rows in force today	16 Gaps not / partially compliant	1 Critical open row	12 Assessed rows missing evidence
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Against the 48 requirements that apply, overall compliance is **14%**, with 42% of requirements assessed so far. For the obligations **already in force today** — AI literacy, prohibited practices and transparency — compliance is **15%**, and **29 open rows** sit in that group. These are not future problems.

Sixteen gaps are open, one of them critical: TalentRank auto-rejects applicants with no human review and no named overseers. High-risk obligations apply from **2 December 2027** for Annex III uses, after the AI Omnibus postponed the original 2026 date — use the time. Risk management, technical documentation and human oversight for a high-risk system are a multi-month programme, not a quarter-end task.

The next legal deadline affecting open items is **2 December 2026** (54 days, 1 open row).

The existing ISO/IEC 27001:2022 and GDPR programmes can be reused for part of the work, but AI-specific content must be added. No existing certification automatically satisfies the AI Act.

The most important next steps are:

1. Assign named, trained human overseers for TalentRank with the authority to overrule it (Art 26(2)) — the single critical open row.
2. Tell people they are talking to AI in the Brighty chatbot (Art 50(1), 50(5)–(6)) — this obligation has applied since 2 August 2026.
3. Run and record the Article 5 prohibited-practice screening for all four systems — in force since 2 February 2025.

2. Customer context

ITEM	DETAIL
Industry	B2B SaaS — project management software
Country	Sweden, with offices in Germany and Poland
Size	300 employees
Business model	Subscription software platform sold to mid-market and enterprise customers.
Certifications	ISO/IEC 27001:2022
Regulations in scope	GDPR, NIS2, EU AI Act
Main concern	Understanding obligations for AI features shipped in the product and for AI tools used internally, in particular in recruitment.

3. Scoping

Answers to the scoping questionnaire that shape the assessment:

QUESTION	ANSWER	WHAT IT MEANS
Does your organisation USE any AI system in the EU (including AI features inside SaaS like M365 Copilot, ATS, CRM)?	Yes	You are a DEPLOYER
Do you DEVELOP AI (or have it developed) and place it on the market or use it under your own name or trademark?	Yes	You are a PROVIDER (for the in-app assistant)
Is any AI used for a purpose in Annex III (biometrics, critical infrastructure, education, HR, credit, life/health insurance, public benefits, emergency, police, migration, justice, elections)?	Yes	HIGH-RISK (unless Art 6(3) exception documented)
Do you have chatbots / AI agents, generate synthetic content, use emotion recognition or biometric categorisation, or publish deepfakes?	Yes	TRANSPARENCY duties (Art 50)
Are you an EMPLOYER using high-risk AI on workers?	Yes	Inform workers and their representatives BEFORE use
Do you train / fine-tune and place on market a general-purpose AI MODEL?	No	Not a GPAI provider — downstream duties only
Do you rebrand, substantially modify, or change the purpose of an AI system (incl. general-purpose AI) into a high-risk use?	To be confirmed	You BECOME PROVIDER of that high-risk system — if confirmed
Is your company an SME / start-up (or small mid-cap)?	To be confirmed	Some simplifications and lower fines may apply

4. AI systems and models identified

NAME	WHAT IT DOES	OWNER	ROLE	PEOPLE AFFECTED	PERSONAL / SENSITIVE DATA	BUCKET
TalentRank — applicant screening	Screens and ranks job applicants by match score; auto-rejects low scorers.	Head of Talent Acquisition · HR	Deployer	Job applicants (~6,000/year)	Yes / Possibly (photos, health info in CVs)	High-risk
Microsoft 365 Copilot	Drafting, summarising and searching internal content for all staff.	IT Manager · IT	Deployer	Employees; indirectly customers whose data is in M365	Yes / Possible	Normal AI
Brightly — customer support chatbot	Answers product questions and creates support tickets on the website and in-app.	VP Product · Product	Provider, Deployer	Customers' staff using the app	Yes / No	Normal AI
CRM churn prediction	Flags customer accounts at risk of churn for sales follow-up.	Head of Sales Ops · Sales	Deployer	Business customers (companies)	Limited (contact names) / No	Normal AI

General-purpose AI models registered: none. A GPAI model is registered only where the organisation itself trains, fine-tunes or releases a general-purpose model and places it on the market (Art 3(63), Art 53).

5. Classification and reasoning

TalentRank — applicant screening — High-risk AI system

- Obligations are filtered for: Deployer. [Article 3(3); Article 3(4); Article 25; Reg. (EU) 2026/1744 Art 1 point (12)]
- Listed in Annex III point 4(b) — employment, worker management and access to self-employment: recruitment or selection, in particular targeted job advertisements, analysing and filtering applications, and evaluating candidates → high-risk (Art 6(2)). Chapter III Sections 1–3 apply from 2 Dec 2027 (Art 113(c)(i) as amended). [Annex III; Article 6(2); Reg. (EU) 2026/1744 Art 1 point (40)]
- Auto-rejection without human review engages Art 14 human oversight and Art 26(2) named, competent overseers with authority to overrule. [Article 14; Article 26(2)]
- Art 26(7): as an employer deploying high-risk AI on workers, inform workers' representatives and affected workers before putting it into service. National co-determination law applies in addition (Art 2(11)). [Article 26(7); Article 2(11)]
- Not built on a third-party GPAI model placed on the market by the vendor as such. [Article 3(68)]

Brightly — customer support chatbot — Normal AI system — transparency track

- Obligations are filtered for: Provider and Deployer — built in-house and operated under the organisation's own name. [Article 3(3); Article 3(4)]
- Art 50(1): AI that interacts directly with natural persons must be designed so people are told they are interacting with AI. Applies since 2 Aug 2026 — in force today. [Article 50(1)]
- Art 50(5)–(6): the information must be clear, given at the latest at first interaction, and accessible. [Article 50(5)–(6)]
- Downstream provider of an AI system built on a GPAI model — not a GPAI model provider. Obtain and keep the model provider's Annex XII information and usage policy (Art 53(1)(b)). [Article 53; Annex XII]

Microsoft 365 Copilot — Normal AI system

- Obligations are filtered for: Deployer. Provider established outside the EU → authorised representative (Art 22). [Article 3(4); Article 22]
- Organisation-wide duties only: AI literacy (Art 4), prohibited-practice screening (Art 5), and Art 50(3) where outputs are shown to people. [Article 4; Article 5; Article 50(3)]
- Downstream deployer of an AI system built on a GPAI model. Obtain the model provider's Annex XII information; complaints to the AI Office under Art 89. [Article 53; Article 89]

CRM churn prediction — Normal AI system

- Obligations are filtered for: Deployer. [Article 3(4)]
- Not in Annex III: the subjects are business customers (legal persons), not natural persons in an Annex III context. Record the reasoning and re-test if the model is ever pointed at individuals. [Annex III; Article 6(2)]
- Organisation-wide duties only (Art 4, Art 5). [Article 4; Article 5]

6. Compliance status

TIER	REQUIREMENTS	COMPLIANT	PARTIALLY	NOT COMPLIANT	NOT ASSESSED	SCORE
All AI systems	15	0	3	0	12	10%
Prohibited practices	9	2	1	0	6	28%
High-risk	20	0	4	9	7	10%
Transparency	2	0	0	2	0	0%
GPAI models	2	0	1	0	1	25%

APPLIES TO	REQUIREMENTS	SCORE
Organisation-wide	26	15%
TalentRank — applicant screening	18	11%
Brighty — customer support chatbot	4	13%
Microsoft 365 Copilot	0	—
CRM churn prediction	0	—

CHAPTER	REQUIREMENTS	SCORE
Ch I — General provisions	12	13%
Ch II — Prohibited AI practices	9	28%
Ch III — High-risk AI systems	12	8%
Ch IV — Transparency obligations for certain AI systems	2	0%
Ch V — General-purpose AI models	1	50%
Ch VIII — EU database for high-risk AI systems	1	0%
Ch IX — Post-market monitoring, information sharing, market surveillance	6	0%

Score: compliant = 1, partially compliant = ½, not compliant / not assessed = 0; requirements marked not applicable are excluded.

7. Key gaps

GAP (BUSINESS LANGUAGE)	APPLIES TO	LEGAL BASIS	RISK	TODAY	EVIDENCE	ACTION
Named, trained people must supervise the AI and have the authority to overrule it.	TalentRank — applicant screening	Art 26(2) From 2 Dec 2027	CRITICAL	Not compliant Auto-rejections are not reviewed by anyone; no named overseers.	0/2 · E-14, E-02	Assign and train human overseers with authority to intervene. Head of Talent Acquisition · 2 Sept 2027

GAP (BUSINESS LANGUAGE)	APPLIES TO	LEGAL BASIS	RISK	TODAY	EVIDENCE	ACTION
AI that interacts directly with people (chatbots, voice bots, AI agents) must be designed so people are told they are talking to AI.	Brighty — customer support chatbot	Art 50(1) Applies now	HIGH	Not compliant Widget shows “Brighty — your helper”; no AI disclosure. Applies since 2 Aug 2026.	0/1 · E-34	Implement and evidence AI-interaction disclosure. VP Product · 7 Dec 2026
Information must be CLEAR and given at the latest at FIRST interaction / exposure, and be ACCESSIBLE.	Brighty — customer support chatbot	Art 50(5)–(6) Applies now	HIGH	Not compliant No accessible AI notice at first interaction.	0/1 · E-34	Implement and evidence AI-interaction disclosure. VP Product · 7 Dec 2026
Use the high-risk AI according to the provider's INSTRUCTIONS FOR USE, with technical and organisational measures.	TalentRank — applicant screening	Art 26(1), (3) From 2 Dec 2027	HIGH	Not compliant No instructions for use received from the vendor.	1/1	Obtain vendor instructions and implement an internal operating procedure. HR + Procurement · 2 Sept 2027
EMPLOYERS: before using high-risk AI at work, INFORM workers' representatives and affected workers.	TalentRank — applicant screening	Art 26(7) From 2 Dec 2027	HIGH	Not compliant Works councils in Sweden / Germany not informed.	0/1 · E-25	Inform workers' representatives and affected workers. HR · 2 Sept 2027
If Annex III high-risk AI makes or helps make DECISIONS about people, INFORM those people that high-risk AI is used.	TalentRank — applicant screening	Art 26(11) From 2 Dec 2027	HIGH	Not compliant Candidates are not told AI is used.	0/1 · E-27	Implement notices to affected persons. Head of Talent Acquisition · 2 Sept 2027

8. Evidence still needed

Evidence codes follow the DATADEFENZ evidence catalogue (E-01 ... E-48), the document set an auditor expects. Twelve assessed rows currently have no evidence attached.

CODE	EVIDENCE	WHAT IT IS	NEEDED FOR
E-01	AI Policy	Top-level policy saying how the company uses AI responsibly and follows the AI Act	Organisation-wide · Art 1, 4, 5, 26
E-02	AI governance charter & RACI	Who decides, who does, who checks for AI	Organisation-wide, TalentRank · Art 17(1)(m), 26(2)
E-03	AI system inventory	List of all AI systems with role, risk class, owner	Organisation-wide · Art 2, 3, 6, 49
E-06	AI literacy programme & records	Training plan by role, materials, attendance	Organisation-wide · Art 4
E-07	Prohibited-practice screening	Check of each AI use against the Art 5 list	Organisation-wide · Art 5
E-08	Classification assessment	Why a system is / is not high-risk, incl. Art 6(3) reasoning	TalentRank, CRM churn prediction · Art 6(2), 6(3)
E-14	Human oversight design & assignment	Oversight measures and named overseers	TalentRank · Art 14(1)–(3), Art 26(2)
E-25	Worker information record	Proof that workers and their representatives were informed before use	TalentRank · Art 26(7)
E-27	Affected-person notice	What candidates are told, and when	TalentRank · Art 26(11), Art 86
E-34	Transparency evidence (Art 50)	AI notices, watermark spec, deepfake labels	Brightly, Microsoft 365 Copilot · Art 50(1), 50(3), 50(5)–(6)
E-36	Downstream information pack	Annex XII information obtained from the GPAI model provider	Brightly, Microsoft 365 Copilot · Art 53(1)(b)
E-43	Serious incident procedure & log	AI incident process with the 2 / 10 / 15-day clocks	Organisation-wide, TalentRank · Art 73, Art 26(5)

9. Reporting duties that apply

These clocks start when an event happens. They should be built into the incident and change procedures now, not written when the first incident occurs.

WHAT	WHO	TO WHOM	DEADLINE	LEGAL BASIS
Serious incident (normal)	Provider	Market surveillance authority (MSA) of the Member State where the incident happened	Immediately, and max 15 DAYS after becoming aware	Art 73(1)–(2)
Serious incident — widespread infringement or critical infrastructure disruption	Provider	MSA	Immediately, max 2 DAYS after awareness	Art 73(3)

WHAT	WHO	TO WHOM	DEADLINE	LEGAL BASIS
Serious incident — death of a person	Provider	MSA	Immediately, max 10 DAYS after awareness	Art 73(4)
Serious incident found by deployer	Deployer	1st: provider → then importer / distributor → and MSA	IMMEDIATELY	Art 26(5)
System presents a risk (Art 79(1))	Deployer	Provider or distributor + MSA	Without undue delay + SUSPEND use	Art 26(5)
Information to workers	Deployer (employer)	Workers' representatives + affected workers	BEFORE putting into service / use	Art 26(7)
Information to affected persons	Deployer	Persons subject to decisions	Before / at time of decision	Art 26(11)
Explanation of decision	Deployer	Affected person (on request)	On request — no fixed deadline in the Act; set an internal SLA (e.g. 30 days)	Art 86
AI interaction / content / deepfake notices	Provider (50(1), 50(2)); deployer (50(3), 50(4))	Natural persons exposed	At the latest at FIRST interaction or exposure	Art 50(5)
Registration — high-risk system	Provider / authorised rep	EU database (Art 71)	BEFORE placing on market / putting into service	Art 49(1)
Personal data breach (GDPR)	Controller	Data protection authority	Within 72 HOURS	GDPR Art 33
Significant incident (NIS2)	Essential / important entity	CSIRT / competent authority	Early warning 24h; notification 72h; final report 1 month	NIS2 Art 23

10. Records to keep

RECORD	WHO KEEPS IT	MINIMUM PERIOD	LEGAL BASIS
Technical documentation (Annex IV)	Provider	10 years after placing on market / putting into service	Art 18(1)(a)
QMS documentation	Provider	10 years	Art 18(1)(b)
EU declaration of conformity	Provider	10 years	Art 18(1)(e); Art 47(1)
Automatically generated logs	Provider	At least 6 months (longer if other law)	Art 19(1)
Automatically generated logs	Deployer	At least 6 months (longer if other law)	Art 26(6)
Special-category data used for bias detection	High-risk providers; other providers / deployers where used	Delete once the bias is corrected or the retention period ends, whichever comes first	Art 10(5) as amended
FRIA	Deployer	Keep current; update when elements change	Art 27(2)

11. Reusing existing frameworks

The organisation already operates ISO/IEC 27001:2022 and a GDPR programme. These help, but **no existing certification automatically satisfies the AI Act**. A mapping shows where existing work can be reused as a starting point — never that one framework satisfies another.

EXISTING CONTROL	AI ACT OBLIGATION	RELATIONSHIP	NOTE
ISO/IEC 27001:2022 — 7.2 Competence; A.6.3 Awareness, education and training	AI literacy of staff and other persons operating AI (Art 4)	Partially reusable	Competence and awareness processes extend to AI roles; the content must be AI-specific.
ISO/IEC 27001:2022 — A.5.1 Policies; A.5.2 Roles and responsibilities; A.5.9 Inventory of information and other associated assets	AI governance: policy, ownership and AI inventory (Art 4, 5, 6, 26)	Partially reusable	Policy framework and roles framework are reusable; the asset inventory can carry an AI flag, but AI-specific attributes are needed.
ISO/IEC 27001:2022 — 6.1.2 Risk assessment; 6.1.3 Risk treatment	Risk management system for the high-risk AI system (Art 9)	Partially reusable	The risk method is reusable; AI harm criteria (health, safety, fundamental rights) must be added.
ISO/IEC 27001:2022 — A.5.31 Legal, statutory, regulatory and contractual requirements	Screen each AI system against prohibited practices (Art 5)	Supporting evidence	The legal requirements register should list Art 5.
ISO/IEC 27001:2022 — A.5.26 Response to information security incidents	Serious incident reporting (Art 73, Art 26(5))	Supporting evidence	The incident response process can carry the AI Act escalation and its clocks.
GDPR — Regulation (EU) 2016/679, Art 35 DPIA	Deployer DPIA using the provider's Art 13 information (Art 26(9)); FRIA (Art 27)	Partially reusable	A DPIA is not a FRIA: the fundamental-rights scope is wider than data protection.

EXISTING CONTROL	AI ACT OBLIGATION	RELATIONSHIP	NOTE
ISO/IEC 42001:2023 — AI management system	Management-system backbone for the AI Act programme	Directly relevant	Closest structural fit: clauses 4–10 and Annex A controls map onto Art 9, 17 and 26 governance duties. Certification is still not a presumption of conformity.

12. Recommended actions

RECOMMENDATION	APPLIES TO	BASIS	PRIORITY
Assign and train named human overseers with the authority to intervene in, and overrule, automated rejections.	TalentRank — applicant screening	Art 14, Art 26(2)	P1
Implement and evidence AI-interaction disclosure at first interaction, accessibly.	Brighty — customer support chatbot	Art 50(1), 50(5)–(6)	P1
Run and record prohibited-practice screening for every AI system.	Organisation-wide	Art 5	P1
Stand up role-based AI literacy training with attendance records.	Organisation-wide	Art 4	P1
Obtain vendor instructions for use and build the internal operating procedure.	TalentRank — applicant screening	Art 26(1), (3)	P2
Inform works councils and affected workers before continued use.	TalentRank — applicant screening	Art 26(7)	P2
Implement candidate notices and an Art 86 explanation route with an internal SLA.	TalentRank — applicant screening	Art 26(11), Art 86	P2
Extend log retention to at least six months under the organisation's own control.	TalentRank — applicant screening	Art 26(6)	P2
Request and file the Annex XII downstream information pack from GPAI model providers.	Brighty, Microsoft 365 Copilot	Art 53(1)(b)	P2
Confirm the Art 25 position and the Art 6(3) reasoning with legal counsel.	TalentRank, CRM churn prediction	Art 25, Art 6(3)	P2

13. Roadmap by legal deadline

Phase 1 — next 30–60 days

Obligations already in force today: AI literacy (Art 4), prohibited practices (Art 5), transparency (Art 50). 29 open rows sit here.

- Publish the AI policy and the AI governance charter with a named owner per system (E-01, E-02).
- Run and record the Art 5 prohibited-practice screening for all four systems (E-07).
- Stand up role-based AI literacy training and keep the attendance record (E-06).
- Fix the Brighty AI-interaction disclosure — Art 50(1) and 50(5)–(6) apply now, not in 2027.
- Request and file the Annex XII downstream information pack from the GPAI model providers behind Brighty and Copilot (E-36).

Phase 2 — before 2 Dec 2026

New Art 5 ban on AI for non-consensual intimate imagery and CSAM; end of the Art 50(2) marking grace period for generative systems already on the market.

- Re-run the Art 5 screening against the amended prohibited list and keep the record.
- Confirm no generative feature in the product falls inside the new ban or the marking duty.

Phase 3 — before 2 Dec 2027

Annex III high-risk obligations (Chapter III) and the linked conformity, registration, monitoring and incident duties. 14 open rows sit here.

- Assign and train named human overseers for TalentRank with authority to overrule (Art 14, Art 26(2)) — this is the critical open row.
- Obtain the vendor's instructions for use and build the internal operating procedure (Art 26(1), (3)).
- Inform works councils in Sweden and Germany, and affected workers, before continued use (Art 26(7)).
- Tell candidates that high-risk AI is used in the decision (Art 26(11)); build the Art 86 explanation route with an internal SLA.
- Configure and retain TalentRank logs for at least six months (Art 26(6)).
- Take the Art 13 information into the DPIA (Art 26(9)); confirm whether a FRIA is required (Art 27).
- Confirm the Art 25 question: if the system is rebranded or substantially modified, the organisation becomes its provider and the full Chapter III Section 2 duty set applies.

Phase 4 — before 2 Aug 2028

Annex I product high-risk obligations.

- Not applicable on current scope — re-test if the product set changes.

14. Responsibilities

OWNER	ACTIONS
Head of Talent Acquisition	Human oversight assignment and training (Art 26(2)); candidate notices (Art 26(11)).
VP Product	AI-interaction disclosure for Brighty (Art 50(1), 50(5)–(6)); Annex XII information pack (Art 53(1)(b)).
HR	Worker and works-council information (Art 26(7)); role-based AI literacy for recruitment staff (Art 4).
HR + Procurement	Vendor instructions for use and the internal operating procedure (Art 26(1), (3)).
IT Manager	Log retention configuration (Art 26(6)); M365 Copilot organisation-wide duties.
CISO / Compliance	AI policy and governance charter (E-01, E-02); Art 5 screening (E-07); incident procedure and clocks (E-43); board briefing (E-47).
Legal	Art 25 and Art 6(3) validation; FRIA determination (Art 27); national labour-law check (Art 2(11)).

15. Next steps

- Validate the classifications marked “to confirm” with legal counsel — in particular the Art 25 question on TalentRank and the Art 6(3) reasoning for CRM churn prediction.
- Confirm owners and due dates for Phase 1 within two weeks.
- Provide the evidence listed in section 8 once, so it can be reviewed against all requirements together.
- Re-assess when any AI system changes purpose, vendor, model or scope, and before each deadline in section 13.
- Monitor regulatory updates: harmonised standards, Commission guidelines on high-risk classification and Art 50, and national implementation.

Appendix A — Requirement register (extract)

A representative extract of the register. The full register for this scope runs to 48 rows, drawn from a master register of 247 rows mapped to the Act and its annexes. “Today” is the compliance status at the date of this report.

APPLIES TO	REF.	REQUIREMENT	TODAY	GAP / ACTION
Organisation-wide	Art 1	Know the purpose of the law: AI in the EU must be human-centric and trustworthy, and protect health, safety and fundamental rights, while supporting innovation.	Partially compliant	AI policy drafted, not yet approved.
Organisation-wide	Art 2(1)	Check if the law applies to you. It covers providers putting AI or GPAI on the EU market, deployers in the EU, non-EU providers / deployers where AI output is used in the EU, importers and distributors, product makers, authorised representatives and affected persons in the EU.	Compliant	Scoping memo covers 3 entities and 4 AI systems.
Organisation-wide	Art 3(1)	Check if your tool is an “AI system”: machine-based, works with some autonomy, may adapt after deployment, and INFERS from input how to produce outputs. Simple rule-based software is not an AI system.	Compliant	Definition test recorded per tool in the register.
Organisation-wide	Art 4	Everyone who uses AI at work needs enough understanding to use it safely. A short, role-based training programme and proof that people completed it.	Partially compliant	General awareness module exists; no role-based module for HR or Product.
Organisation-wide	Art 5	Some uses of AI are banned outright in the EU. Formally check each AI system against that list and keep the record.	Not compliant	No documented screening. GAP — Phase 1.
Organisation-wide	Art 99(3)–(5)	MAX FINES: Art 5 breach — EUR 35M or 7% of worldwide turnover; operator duties (Arts 16, 22, 23, 24, 25(2) and (4), 26, 31, 33, 34, 50) — EUR 15M or 3%; incorrect or misleading information to authorities — EUR 7.5M or 1% (whichever is HIGHER, except for SMEs / SMCs).	Not assessed	Board briefing and ERM entry outstanding (E-47).
Brightly — customer support chatbot	Art 50(1)	AI that INTERACTS directly with people (chatbots, voice bots, AI agents) must be designed so people are TOLD they are talking to AI.	Not compliant	Widget shows “Brightly — your helper”; no AI disclosure. GAP — Phase 1.
Brightly — customer support chatbot	Art 50(5)–(6)	Information must be CLEAR and given at the latest at FIRST interaction / exposure, and be ACCESSIBLE.	Not compliant	No accessible AI notice at first interaction. GAP — Phase 1.
Brightly — customer support chatbot	Art 53(1)(b)	DOWNSTREAM side: if you build AI on someone else’s GPAI model, REQUEST and keep the Annex XII information to support your own compliance.	Partially compliant	Model card held; usage policy and Annex XII pack not obtained.
TalentRank — applicant screening	Art 6(2)	AI used in any Annex III area is HIGH-RISK (biometrics, critical infrastructure, education, employment, essential services, law enforcement, migration, justice).	Compliant	Classified high-risk under Annex III point 4(b); reasoning recorded (E-08).

APPLIES TO	REF.	REQUIREMENT	TODAY	GAP / ACTION
TalentRank — applicant screening	Art 26(1), (3)	Use the high-risk AI according to the provider's INSTRUCTIONS FOR USE, with technical and organisational measures.	Not compliant	No instructions for use received from the vendor. GAP — Phase 3.
TalentRank — applicant screening	Art 26(2)	Assign HUMAN OVERSIGHT to named people with competence, training, authority and support.	Not compliant	Auto-rejections are not reviewed by anyone; no named overseers. CRITICAL — Phase 3.
TalentRank — applicant screening	Art 26(4)	If you control INPUT DATA, make sure it is relevant and sufficiently representative for the purpose.	Not assessed	
TalentRank — applicant screening	Art 26(5)	MONITOR the system per the instructions for use. If risk: inform provider / distributor and authority without delay and SUSPEND use. If serious incident: inform immediately.	Not assessed	
TalentRank — applicant screening	Art 26(6)	Keep LOGS under your control at least 6 MONTHS (or longer if other law; financial institutions per sector rules).	Not compliant	Vendor retains logs for 30 days. GAP — Phase 3.
TalentRank — applicant screening	Art 26(7)	EMPLOYERS: before using high-risk AI at work, INFORM workers' representatives and affected workers.	Not compliant	Works councils in Sweden / Germany not informed. GAP — Phase 3.
TalentRank — applicant screening	Art 26(9)	Use the provider's Art 13 information to do your DPIA under GDPR Art 35 (or LED Art 27) where needed.	Partially compliant	DPIA exists from 2024; not updated with AI Act content.
TalentRank — applicant screening	Art 26(11)	If Annex III high-risk AI makes or helps make DECISIONS about people, INFORM those people that high-risk AI is used.	Not compliant	Candidates are not told AI is used. GAP — Phase 3.
TalentRank — applicant screening	Art 26(12)	COOPERATE with competent authorities.	Not assessed	
TalentRank — applicant screening	Art 86	Affected persons can ask for an EXPLANATION of a decision taken with high-risk AI that affects them.	Not assessed	No internal SLA set.
TalentRank — applicant screening	Art 111(2)	LEGACY high-risk AI placed on the market before Chapter III applies (2 Dec 2027 Annex III; 2 Aug 2028 Annex I): the Act applies only if the system is SIGNIFICANTLY CHANGED in design after that date.	Not assessed	Vendor roadmap not reviewed against this test.
Microsoft 365 Copilot	Art 89	AI Office MONITORS GP AI compliance (incl. codes). DOWNSTREAM providers can file a reasoned COMPLAINT about a GP AI provider.	Not assessed	
Microsoft 365 Copilot	Art 50(3)	People must be told if AI is analysing their emotions or classifying them from biometric data — and some such uses are banned.	Not applicable	No emotion recognition or biometric categorisation in scope.
CRM churn prediction	Art 6(2)	AI used in any Annex III area is HIGH-RISK.	Compliant	Subjects are legal persons, not natural persons. Reasoning recorded (E-08).

Appendix B — Sources and method

Regulation (EU) 2024/1689 (OJ L, 12.7.2024); Regulation (EU) 2026/1744 amending it (OJ L, 24.7.2026, in force 27.7.2026) — amendments cited by point of its Article 1; Commission Guidelines on prohibited AI practices (C(2025) 884); Commission Guidelines on Article 50 transparency obligations (C(2026) 5054).

Requirements are taken from a master register of 247 rows mapped to these texts. Applicability follows the classification of each AI system and model — role, bucket and conditions — so a deployer of a normal AI system is not shown provider duties for a high-risk system. Dates follow Article 113 as amended.

Amendments introduced by the AI Omnibus should be verified against the consolidated text before being relied on for a filing or a board decision.

Based on the available regulatory sources. Potentially applicable — requires consultant and legal validation. This document does not provide legal advice and is not a statement that any organisation is or is not compliant.

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