

Data Processing Principles for AI-Enabled SoftBCom Services

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Preamble

These principles apply to AI-enabled services provided by SoftBCom Berlin GmbH, currently including **QAWacht** and **SoftBCom AI Agents**.

They summarize the core data processing approach for AI-enabled, LLM-based, speech-related and similar externally supported functionalities. They are intended as a concise explanatory document and supplement the applicable contractual documentation, including the Data Processing Agreement (DPA), the list of subprocessors and related service documentation.

1. General Principles

SoftBCom applies the principles of **purpose limitation**, **data minimization** and **appropriate technical and contractual safeguards** to all AI-enabled services.

Where technically feasible and commercially reasonable, SoftBCom seeks to use **European providers**, **European hosting environments** and **European regional endpoints** for relevant stages of processing. Where this is not fully possible, the relevant processing chain is covered by appropriate contractual safeguards, including **DPAs** and **Standard Contractual Clauses (SCCs)** where applicable.

Different AI-enabled services follow different technical protection approaches depending on their function.

2. QAWacht

2.1 No Storage of Voice Recordings

Voice conversations are not stored after processing. Content is transcribed on QAWacht servers located in Germany.

2.2 Storage of Transcripts

Transcripts are stored and processed in accordance with applicable GDPR requirements.

2.3 Minimization

Only the data necessary for the relevant processing purpose is transferred, processed and stored.

2.4 Anonymization

For the logical processing of transcripts (e.g. quality assessment or generation of client responses), the use of cloud-based language models located outside Germany is

permitted only after anonymization or pseudonymization, unless otherwise agreed in a dedicated agreement.

The following data must be anonymized before being processed by external AI services:

- first and last names,
- phone numbers,
- email addresses,
- credit card numbers,
- and other potentially sensitive data as defined in separate project-specific agreements.

2.5 Block-Level Anonymization of Numerical Data

Numerical identifiers (e.g. credit card numbers) are anonymized as entire blocks, not digit by digit.

2.6 Verifiable Anonymization

Anonymization must be implemented in a verifiable and technically appropriate manner.

3. SoftBCom AI Agents

3.1 Fragmentation and minimization

Where technically feasible and appropriate for the relevant workflow:

- processing steps are separated across functional components,
- only the necessary fragment of content is transmitted to a given service,
- the contextual scope is limited to what is required for the specific task,
- and unnecessary aggregation of full interaction content across external services is avoided.

3.2 Best-effort use of European providers

SoftBCom engages subprocessors that offer **European-based hosting environments** and **regional endpoints** and generally aim to process relevant AI Agent requests within Europe.

However, neither SoftBCom nor such subprocessors guarantee that all stages of processing will take place exclusively within the EU/EEA. This applies in particular where a subprocessor relies on its own subprocessors or distributed internal service infrastructure.

Where technically feasible and appropriate, voice-related processing is carried out within Europe on a best-effort basis.

4. Integration into Data Processing Agreements

These principles may become part of the Data Processing Agreement (DPA) between SoftBCom Berlin GmbH and the respective client. They may apply as Annex [X] to supplement product-specific agreements for the relevant AI-enabled SoftBCom service.

SoftBCom Berlin GmbH

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