FOR: EU BANKS · ASSET MANAGERS · INSURANCE · DORA-SCOPE FINANCIAL ENTITIES

# AI that satisfies your DPO and your DORA auditor.

*Enterprise AI substrate for EU financial institutions — sovereign deployment in EU regions, GDPR-aligned architecture, DORA-ready operational resilience, BYO LLM.*

> *Glean, Hebbia, Harvey, and Copilot all process EU customer data on US infrastructure — each triggers a Schrems II Transfer Impact Assessment and a 2-3 month DPO delay. Sparcle deploys in your EU region (Frankfurt, Dublin, Amsterdam, Stockholm, Paris);* ***the third-country transfer never happens.*** *No TIA. No SCC negotiation. No Article 49 derogation.*

### GDPR residency + Schrems II

*"How do we comply with GDPR Article 44 (transfers to third countries) when adopting an AI tool?"*

**Sparcle:** You don't transfer. Sparcle deploys in your EU region's sovereign cloud (Azure West Europe, AWS eu-central-1, GCP europe-west) or your on-prem EU data center. **Personal data of EU data subjects stays in the EEA.** No Article 44 transfer event. No SCC, no BCR, no derogation.

### DORA classification

*"DORA requires us to maintain a register of ICT third-party service providers. How does Sparcle classify?"*

**Sparcle:** As a software vendor whose product runs inside your operational perimeter, **not as an ICT third-party service provider.** DORA Article 28 register treats us as non-critical. Compare to Glean / Hebbia / Harvey, which are ICT service providers requiring full Article 30 contractual provisions and exit strategy assessments.

### Article 17 Right to Erasure

*"When a data subject invokes Article 17, how do we erase their data from AI embeddings?"*

**Sparcle:** Crypto-shred. Per-tenant CMK held in your Vault or KMS. Deleting the key cryptographically destroys all derived data — vector embeddings, keyword indexes, audit-event payloads. **Your Article 17 response window becomes a one-API-call operation, not a multi-vendor coordination exercise.**

### What's shipped today vs what ships in a 90-day EU pilot

| | |
|---|---|
| EU-region deployment (Frankfurt / Dublin / Amsterdam / Stockholm / Paris) | SHIPPED |
| GDPR-aligned architecture (residency, crypto-shred, audit) | SHIPPED |
| Per-tenant CMK with EU-resident KMS (Vault, AWS KMS eu-region, Azure Key Vault) | SHIPPED |
| Sealed Merkle audit chain (BaFin / ACPR / Banca d'Italia examination-ready) | SHIPPED |
| 4-axis ACL — `country` axis explicitly supports EU-member-state segmentation | SHIPPED |
| Cross-region transfer refusal + real-time ACL invalidation + ingest saga | PILOT |
| DORA Article 30 register support documentation | AVAILABLE |
| ISO 27001 / ISO 27017 (~18 months in audit cycle) | NOT HELD |

## Why EU financial buyers choose us

1. **Sparcle does not invoke Schrems II.** No transfer occurs. Your DPO sleeps better.
2. **DORA register treats us as non-critical.** Most AI vendors land in Article 28 critical-ICT-third-party scope; Sparcle does not.
3. **EU-sovereign LLM choice.** BYO LLM means Mistral Large, Aleph Alpha, or any model fitting your AI Act risk class. Glean / Hebbia / Harvey funnel through US-based GPT-4 endpoints.
4. **EU AI Act readiness.** The audit chain produces the "logs and traceability" evidence the AI Act will require of high-risk system providers.

> **Recommended deployment:** any self-hosted Bolt tier — **Authorize**, **Backbone**, or **Certify** — customer-hosted in your EU region (Frankfurt / Dublin / Amsterdam / Stockholm / Paris). All are fully customer-hosted, run on your own EU-sovereign LLM, and send zero outbound traffic to Sparcle. There is no Sparcle-managed hosting tier and no Sparcle-managed sub-processor, in any tier — nothing runs on Sparcle infrastructure. Avoids both Schrems II transfer events and DORA Article 28 critical-ICT-third-party classification.

**Brief us in 30 minutes. EU-region production pilot in 90 days.**

*Sovereign enterprise AI — inside your perimeter, with your LLM, on your audit trail.*

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