

# EU AI Act: 23-Point Technical Compliance Checklist

The Veil — Privacy-first AI infrastructure

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## Category 1: Decision Logging & Provenance (Art. 12)

- %j 1. AI decisions are recorded with structured metadata (model, inputs, outputs, confidence)
- %j 2. Decision records are cryptographically signed (Ed25519 or equivalent)
- %j 3. Records are chained (hash chain) to prevent tampering
- %j 4. Independent timestamps from external TSA (RFC 3161)
- %j 5. Decision records are retained for the system's regulatory minimum lifetime

## Category 2: Human Oversight (Art. 14)

- %j 6. Authorised personnel can access decision records on demand
- %j 7. Decision records include sufficient context to understand the AI's reasoning
- %j 8. Human override mechanisms exist for high-risk decisions
- %j 9. Oversight interfaces are available for DPOs (not just engineers)
- %j 10. Audit trail links decisions to the humans who reviewed them

## Category 3: Identity Separation & Data Minimisation (Art. 10, GDPR Art. 25)

- %j 11. PII is detected before AI processing (automated, not manual)
- %j 12. Identity data is separated from AI inference at infrastructure level
- %j 13. AI models cannot access identity data (network-enforced, not policy-enforced)
- %j 14. Pseudonymous tokens replace identity in AI processing
- %j 15. Re-linkage requires explicit authorisation workflow

## Category 4: Data Governance (Art. 10)

- %j 16. AI training data is inventoried and documented
- %j 17. Operational data flows are mapped and classified
- %j 18. Data retention and deletion policies are technically enforced
- %j 19. Cross-border data transfers are tracked and compliant
- %j 20. Data quality checks run before AI processing

## Category 5: Verification & Audit (Art. 15, Art. 61)

- %j 21. Compliance can be verified independently (not self-reported)
- %j 22. Certificates or attestations are available for auditors
- %j 23. Regular compliance testing is automated (not annual manual review)

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*This checklist is based on The Veil platform's interpretation of EU AI Act requirements for high-risk AI systems. It is not legal advice. Consult your legal team for jurisdiction-specific guidance.*