

# 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 **DPA**s 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.

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