

## Data Processing Principles for QAWacht and AI-Based Systems

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### Preamble

These data protection principles apply to the use of the software solution **QAWacht** and comparable AI-driven systems, especially automated telephone agents developed or operated by SoftBCom Berlin GmbH. The purpose is to transparently present the core principles for processing personal data in compliance with the General Data Protection Regulation (GDPR) and to uphold high security and ethical standards when using artificial intelligence.

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**1. No Storage of Voice Recordings** Voice conversations are not stored after processing. All content is transcribed on QAWacht servers located in Germany. Voice data never leaves this environment under any circumstances.

**2. Storage of Transcripts in Compliance with GDPR** Transcriptions are stored and processed exclusively in accordance with GDPR requirements.

**3. Use of Cloud-Based LLMs Only After Anonymization** For the logical processing of transcripts (e.g., quality assessment, generation of client responses), the use of cloud-based language models located outside Germany is permitted only after full anonymization, if the other is not specified in the signed form in dedicated agreement.

**4. Mandatory Comprehensive Anonymization** The following data must be anonymized before being processed by external AI services (if the other is not specified in the signed form in dedicated agreement):

- First and last names
- Phone numbers
- Email addresses
- Credit card numbers
- Other potentially sensitive data as defined in separate project-specific agreements.

**5. Block-Level Anonymization of Numerical Data** Numerical identifiers (e.g., credit card numbers) are anonymized as entire blocks, not digit-by-digit.

**6. Verifiable Anonymization Effectiveness** Anonymization must reach at least 95% effectiveness.

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**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 apply as Annex [X] to supplement product-specific agreements for QAWacht.

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**Signed by SoftBCom Berlin GmbH**

Place, Date: Berlin, 24.12.2025

Signature: 

Name: Vladimir K. Dudchenko

Position: Managing Director