

# SELF-ASSESSMENT CERTIFICATE

## Privacy & Information Security Compliance

Document Ref: **AS-2026-001** | Version: **1.1** | Issue Date: **16 January 2026** | Classification: **PUBLIC**

Outcome	HIGH COMPLIANCE (within reviewed scope)
Frameworks	revFADP (Switzerland) • GDPR (EU 2016/679) • ISO/IEC 27001 alignment (ISMS controls)
Assessment date	16 January 2026
Assurance level	Self-assessment / limited assurance (technical review)
Auditor / Signatory	Antonio Brundo — Computer Engineer & Cyber Analyst

### 1. Entity Information

**Company:** Exatoshi AG (Brand: AIAgens)

**Registered Office:** Via Riva Paradiso 30, 6900 Paradiso, Switzerland

**Website:** <https://aiagens.ch>

**DPO / Data Protection Officer:** [dpo@aiagens.ch](mailto:dpo@aiagens.ch)

### 2. Statement of Compliance

This certificate attests that the technological infrastructure and data processing workflows of **aiagens.ch** were subject to a technical assessment on the issue date. Based on the evidence reviewed, the platform demonstrates a **High Compliance** posture against:

- revised Swiss Federal Act on Data Protection (revFADP / nFADP)
- EU General Data Protection Regulation (GDPR, Regulation (EU) 2016/679)
- alignment with ISO/IEC 27001 Information Security Management System (ISMS) control objectives (*alignment, not an accredited certification*).

### 3. Scope & Methodology

**Scope.** The assessment covered application-layer privacy components, consent flows, data subject rights automation, data minimization and retention approach (including Zero■Data Persistence where applicable), a sub-processor register review, and selected infrastructure and server configuration controls for the production environment.

**Methods.** Evidence-based review including source code inspection, configuration review and control walkthroughs.

**Evidence reviewed (non-exhaustive).** `privacy-manager.js`, `gdpr_routes.py`, `consent_service.py`; selected server configurations.

**Limitations.** This is a limited-assurance self-assessment; it does not replace a full third■party certification, penetration testing program, or legal advice.

### 4. Technical & Organizational Measures (TOMs) – Verified Controls

Control Domain	Implemented Measure	Status
Encryption	AES■256 for data at rest; TLS/SSL for data in transit.	Verified
Identity & Access	RBAC and mandatory MFA for administrative accounts.	Verified

Consent Management	Consent logging with IP/timestamp; multilingual options.	Verified
Data Subject Rights (DSARs)	DSARs for data export (portability) and erasure with 30-day grace period.	Verified
Data Minimization & Retention	Zero-Data Persistence model on proprietary infrastructure. Real-time voice processing over TLS 1.3 to ElevenLabs.	Verified

5. Data Handling Model – Zero-Data Persistence

AIAgens operates under a **Zero-Data Persistence** model on proprietary infrastructure. All voice data is processed in real time over **TLS 1.3** encrypted connections towards ElevenLabs’ processing infrastructure. **No personal data (PII) or audio recordings are permanently stored** on AIAgens servers. This design materially reduces the risk of unintended data exposure and supports the GDPR and revFADP principles of **data minimization** and **storage limitation**.

6. Sub-Processor Register

Last updated: 15 January 2026

Provider	Processing Purpose	Data Location	Compliance / Transfer Basis
Hetzner	Infrastructure Hosting	EU (Germany)	GDPR / nFADP
ElevenLabs	AI Voice Processing (real-time)	EU (Frankfurt)	GDPR / nFADP
Anthropic	AI Language Processing (Claude)	USA	SCCs
Stripe	Payment Processing	EU + USA	PCI-DSS / GDPR
Google Cloud	Analytics & Integrations	EU + USA	GDPR
Postmark	Transactional Email Delivery	USA	SCCs

7. Findings & Risk Posture

No issues rated **High** or **Critical** were identified within the reviewed scope. Operational improvements and minor observations (if any) are handled as continuous improvement items under the organization’s governance process.

Severity	Definition (summary)
Critical	Immediate and material impact; requires urgent remediation.
High	Significant impact or high likelihood; prioritized remediation required.
Medium	Moderate impact; remediation planned within reasonable timeframe.
Low	Limited impact; address through backlog / hygiene improvements.
Info	No direct risk; informational or best-practice guidance.

8. Verification & Integrity

This document includes a verifiable **payload hash** (SHA256) calculated over the canonical JSON payload shown in Appendix A. A verification QR code is provided for operational convenience.

**Verification URL**

<https://aiagents.ch/compliance/verify?doc=AS-2026-001&v;=1.1&class;=PUBLIC&payload;=4f1112d2b87f8095657923b845e1065519762da83fe773c9ed99ac906da15e25>

**Payload Hash (SHA256)**

4f1112d2b87f8095657923b845e1065519762da83fe773c9ed99ac906da15e25

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## 9. Sign-off

**Digitally signed (declarative attestation)**

Antonio Brundo

Computer Engineer & Cyber Analyst

Red Teaming & Government Compliance Specialist

<https://antoniobrundo.org>

## Disclaimer & Limitations

This certificate is a **self-assessment** based on the evidence made available at the time of review and within the scope described. It is not an accredited ISO certification, does not constitute legal advice, and should not be relied upon as a guarantee of ongoing compliance. Compliance is a continuous process and depends on operational controls, organizational measures, and changes in systems and regulations.

## Appendix A — Canonical Payload (for hash verification)

The payload hash printed in Section 8 is computed as SHA-256 over the UTF-8 bytes of the following canonical JSON (keys sorted, compact separators).

```
{
  "assessment_date": "2026-01-16",
  "change_log": [
    {
      "change": "Added Zero-Data Persistence statement and TLS 1.3 real-time voice processing note.",
      "date": "2026-01-16",
      "version": "1.1"
    },
    {
      "change": "Initial release.",
      "date": "2026-01-16",
      "version": "1.0"
    }
  ],
  "classification": "PUBLIC",
  "conclusion": {
    "assurance_level": "Self-assessment / limited assurance (technical review)",
    "summary": "Privacy by Design and Security by Default posture observed; no High or Critical issues identified in the review"
  },
  "data_handling_model": {
    "statement": "Zero-Data Persistence: AIAGens operates a Zero-Data Persistence model on proprietary infrastructure. Voice processing is handled by ElevenLabs.",
    "storage_on_aiagens": {
      "audio_persistent_storage": false,
      "pii_persistent_storage": false
    },
    "voice_processing": {
      "mode": "real_time",
      "transport_security": "TLS 1.3",
      "vendor": "ElevenLabs"
    },
    "zero_data_persistence": true
  },
  "document_ref": "AS-2026-001",
  "document_title": "Self-Assessment Certificate - Privacy & Information Security Compliance",
  "entity": {
    "brand": "AIAGens",
    "company": "Exatoshi AG",
    "dpo_email": "dpo@aiagens.ch",
    "registered_office": "Via Riva Paradiso 30, 6900 Paradiso, Switzerland",
    "website": "https://aiagens.ch"
  },
  "evidence_references": [
    "privacy-manager.js",
    "gdpr_routes.py",
    "consent_service.py",
    "Server configuration review (selected)"
  ],
  "frameworks": [
    "Swiss Federal Act on Data Protection (revised FADP / nFADP)",
    "EU GDPR (Regulation (EU) 2016/679)",
    "ISO/IEC 27001 - alignment with ISMS control objectives (not an accredited certification)"
  ],
  "issue_date": "2026-01-16",
  "signatory": {
    "name": "Antonio Brundo",
    "role": "Computer Engineer & Cyber Analyst",
    "specialization": "Red Teaming & Government Compliance",
    "website": "https://antoniobrundo.org"
  },
  "subprocessors": [
    {
      "compliance_basis": "GDPR / nFADP",
      "data_location": "EU (Germany)",
      "provider": "Hetzner",
      "purpose": "Infrastructure Hosting"
    },
    {
      "compliance_basis": "GDPR / nFADP",
      "data_location": "EU (Frankfurt)",
      "provider": "ElevenLabs",
      "purpose": "Voice processing"
    }
  ]
}
```

```
    "purpose": "AI Voice Processing (real-time)"
  },
  {
    "compliance_basis": "SCCs",
    "data_location": "USA",
    "provider": "Anthropic",
    "purpose": "AI Language Processing (Claude)"
  },
  {
    "compliance_basis": "PCI-DSS / GDPR",
    "data_location": "EU + USA",
    "provider": "Stripe",
    "purpose": "Payment Processing"
  },
  {
    "compliance_basis": "GDPR",
    "data_location": "EU + USA",
    "provider": "Google Cloud",
    "purpose": "Analytics & Integrations"
  },
  {
    "compliance_basis": "SCCs",
    "data_location": "USA",
    "provider": "Postmark",
    "purpose": "Transactional Email Delivery"
  }
],
"subprocessors_last_updated": "2026-01-15",
"verified_toms": [
  "Encryption at rest (AES-256) and in transit (TLS/SSL).",
  "Access control via RBAC and mandatory MFA for administrators.",
  "Consent Management with IP/timestamp logging and multilingual options.",
  "Data Subject Rights APIs for data export (portability) and erasure with 30-day grace period.",
  "Zero-Data Persistence: AIAgents operates a Zero-Data Persistence model on proprietary infrastructure. Voice data is processed and stored in a secure, encrypted manner, with no data retained on external servers."
],
"version": "1.1"
}
```

Appendix B — Change Log

Version	Date	Change
1.1	2026-01-16	Added Zero-Data Persistence statement and TLS 1.3 real-time voice processing note.
1.0	2026-01-16	Initial release.

PUBLIC RELEASE