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1 · Overview

Nurithm Limited operates the Revan Platform, an AI-powered consultancy environment hosted in OpenAI's ChatGPT Business infrastructure.

All processing of client or personal data is conducted under the UK GDPR and EU GDPR, with OpenAI acting as data processor under a signed Data Processing Addendum (executed 9 Oct 2025).

This summary presents Nurithm's compliance posture for clients, investors, and regulators, confirming that data protection principles, lawful bases, and technical controls are fully implemented and auditable.

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2 · Compliance Highlights

| Category                    | Key Control                                                                   | Compliance Status |
|-----------------------------|-------------------------------------------------------------------------------|-------------------|
| -----                       | -----                                                                         | -----             |
| Governance & Accountability | Signed DPA with OpenAI; ROPA maintained; Compliance Index registered.         | Complete          |
| Lawful Processing           | Contractual necessity + legitimate interests basis documented in ROPA & DPIA. | Complete          |
| Transparency                | Client Transparency Notice (v1.1) publicly available.                         | Complete          |
| Risk Assessment             | DPIA v1.3 (Audit Edition) completed - residual risk rated "Low".              | Complete          |
| Rights Handling             | Data-Subject Rights Procedure v1.0 active; SLA <=30 days.                     | Complete          |
| Security & Integrity        | AES-256 / TLS 1.2+, MFA, RBAC, tenant isolation (OpenAI SOC 2 Type II).       | Complete          |
| Cross-Border Transfers      | EU SCCs + UK Addendum implemented (Art 46 GDPR).                              | Complete          |
| Retention & Deletion        | Auto-deletion <=30 days post-contract; deletion logs maintained.              | Complete          |
| Training & Awareness        | Annual privacy & security training for personnel.                             | Scheduled         |
| Audit Readiness             | All evidence traceable within /Compliance repository.                         | Ready             |

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3 · Core Compliance Documents

| Document                                  | Version                   | Purpose                                          |
|-------------------------------------------|---------------------------|--------------------------------------------------|
| ----- ----- -----                         |                           |                                                  |
| Data Processing Addendum (OpenAI-Nurithm) | v2024 (signed 9 Oct 2025) | Controller-Processor contract & SCCs.            |
| Record of Processing Activities (ROPA)    | v1.0 (Oct 2025)           | Lawful basis, retention, data categories.        |
| DPIA - Revan Platform                     | v1.3 (Oct 2025)           | Full risk and mitigation audit.                  |
| Client Transparency Notice                | v1.1 (Oct 2025)           | Public disclosure of processing activities.      |
| Data-Subject Rights Procedure             | v1.0 (Oct 2025)           | Operational procedure for data-subject requests. |
| Compliance Index Register                 | v1.0 (Oct 2025)           | Master document map and audit reference sheet.   |

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4 · Summary Statement

Nurithm Limited demonstrates full compliance with Articles 5, 6, 9, 12-30, 32, 35, and 46 of the UK/EU GDPR.

All governance artefacts are version-controlled, signed, and auditable within Nurithm's Compliance Repository.

Residual data-protection risk for the Revan Platform remains Low under ICO risk thresholds.

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5 · Sign-off

| Role              | Name / Title          | Date         |
|-------------------|-----------------------|--------------|
| ----- ----- ----- |                       |              |
| Prepared by       | Compliance Lead       | October 2025 |
| Reviewed by       | Managing Director     | October 2025 |
| Approved by       | Nurithm Limited Board | October 2025 |