KARV TRAINING

EU AI ACT TRAINING FOR IRISH ORGANISATIONS

FOR YOUR DATA PROTECTION OFFICER

How we handle your staff's data when we deliver Article 4 training.

One page to answer the questions a DPO asks before a training booking. The binding terms are Part C of our Terms and Conditions (the Article 28 data processing schedule) and our Privacy Policy, both at karvtraining.com. This summary does not replace them.

ROLES

Your organisation	Controller for attendee data.
Karv	Karv Web Education Solutions Ltd, processor, acting only on your documented instructions.
Verification	For the public certificate check at karvtraining.com/verify, Karv is controller (legitimate interest).

WHAT WE PROCESS

- Name, work email, job title, contractor flag.
- Attendance: minutes attended. Online, join and leave times from the registered Zoom link, used to calculate minutes and then deleted.
- Your tool inventory (which AI systems are in use and by which roles), used to calibrate the session and written into the record.

WHAT WE NEVER COLLECT

- No test scores or assessments. Article 4 requires none.
- No recordings or transcripts of sessions.
- No personal email addresses or phone numbers.
- No special category data.

WHAT YOU RECEIVE

- The organisational training record: inventory, measure, attendance list, calibration note, review date. Dated, signed by the delivering trainer, sent to your named contact only.
- Each attendee receives an individual Certificate of Attendance by email. It acknowledges attendance and points back to your record by reference.

WHERE IT LIVES

Database and files	Supabase, EU region (Ireland). Row-level security on every table; no anonymous access; private storage with short-lived signed links.
Admin access	Three trainers only, password plus mandatory authenticator app. Every action written to an append-only audit log.
Hosting	Vercel, functions in Frankfurt. HTTPS only, HSTS, strict content security policy.
Email	Resend, from karvtraining.com with DKIM, SPF and DMARC.

RETENTION, ENFORCED IN CODE

Raw join/leave	Deleted 30 days after the record is issued. Only minutes attended is kept.
Everything else	Attendance, certificates and records deleted 3 years after the session, or the period you instruct in writing. Nightly scheduled job, each run logged.
Verification logs	Failed lookups kept 30 days with a salted, rotating hash of the IP address, never the address itself.

SUB-PROCESSORS

- Supabase (EU). Zoom (US, SCCs and Data Privacy Framework; only where the session runs on our account). Resend (US, SCCs). Vercel (EU functions, SCCs). Google Workspace (EU region, SCCs). Cal.com for bookings only.

ATTENDEE RIGHTS

- Access: full export. Rectification: corrected, certificate reissued. Erasure: personal fields removed, certificate revoked so verification returns "not found", file deleted.
- Requests are referred to you as controller and actioned on your instruction, within one month.

BREACH

- As your processor we notify your named contact without undue delay and assist with your own assessment and any DPC notification.

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