

# EU AI Act Risk Classification & Compliance Assessment

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SolaraCloud AI LLC — SolaraIMPACT Platform

Version 1.0 | March 2026 | Prepared by: Mykhaylo Antonovych, CEO

## SECTION 1: PURPOSE AND SCOPE

This document constitutes SolaraCloud AI LLC's formal risk classification and compliance assessment for the SolaraIMPACT platform under Regulation (EU) 2024/1689 of the European Parliament and of the Council on Artificial Intelligence (the "EU AI Act"). It establishes SolaraIMPACT's classification within the EU AI Act risk hierarchy, identifies applicable obligations, and serves as the primary compliance reference for regulatory purposes.

This assessment covers:

- The SolaraIMPACT SaaS platform and all AI-powered modules
- All AI model integrations (Anthropic Claude, OpenAI GPT, Google Gemini, xAI Grok)
- SolaraCloud AI LLC's role as Provider under the EU AI Act

## SECTION 2: COMPANY AND SYSTEM IDENTIFICATION

Company	SolaraCloud AI LLC
Registered	Florida, United States
Contact	contact@solaracloud.ai   privacy@solaracloud.ai
Website	solaracloud.ai
AI System Name	SolaraIMPACT
System Type	AI-powered SaaS platform

Intended Use	AI-generated strategic analysis, content generation, campaign planning, competitive intelligence, and workflow automation for marketing and public relations agencies
Primary Users	Marketing professionals, PR agencies, communications teams
Geographic Markets	United States, European Union, United Kingdom, and other jurisdictions

### **SECTION 3: EU AI ACT ROLE CLASSIFICATION**

SolaraCloud AI LLC operates as a PROVIDER under Article 3(3) of the EU AI Act, defined as a natural or legal person that develops an AI system or a general-purpose AI model and places it on the market or puts it into service under its own name or trademark.

SolaraCloud AI LLC is NOT:

- A provider of a General-Purpose AI Model (GPAI) — SolaraIMPACT consumes third-party GPAI models via API but does not develop or offer its own foundation model
- A deployer only — SolaraIMPACT is offered to business customers under SolaraCloud AI LLC's own name and branding

SolaraIMPACT's customers (marketing agencies and businesses) are DEPLOYERS under Article 3(4), using the system under their authority for professional purposes.

### **SECTION 4: PROHIBITED AI PRACTICES ASSESSMENT (Article 5)**

Assessment against all prohibited AI practices under Article 5:

#### **4.1 Subliminal manipulation (Article 5(1)(a))**

NOT APPLICABLE. SolaraIMPACT generates marketing strategy content at the explicit request of professional users. It does not deploy subliminal techniques to manipulate behavior beyond users' conscious awareness.

#### **4.2 Exploitation of vulnerabilities (Article 5(1)(b))**

NOT APPLICABLE. The platform targets professional marketing and PR practitioners, not vulnerable individuals or protected groups.

#### **4.3 Social scoring by public authorities (Article 5(1)(c))**

NOT APPLICABLE. SolaraIMPACT is not used by or for public authorities for social scoring purposes.

#### **4.4 Real-time remote biometric identification (Article 5(1)(d))**

NOT APPLICABLE. The platform does not use biometric identification of any kind.

#### **4.5 Biometric categorization (Article 5(1)(e))**

NOT APPLICABLE. No biometric data is processed.

#### **4.6 Emotion recognition in workplace/education (Article 5(1)(f))**

NOT APPLICABLE. The platform does not include emotion recognition capabilities.

#### **4.7 Manipulation of democratic processes (Article 5(1)(g))**

NOT APPLICABLE. The platform is used for commercial marketing and PR, not political campaigning or electoral manipulation.

CONCLUSION: SolaraIMPACT does not engage in any prohibited AI practice under Article 5 of the EU AI Act.

### **SECTION 5: HIGH-RISK AI SYSTEM ASSESSMENT (Article 6 and Annex III)**

Assessment against all high-risk categories in Annex III:

- Biometric identification and categorisation: NOT APPLICABLE
- Critical infrastructure management: NOT APPLICABLE
- Education and vocational training: NOT APPLICABLE
- Employment, workers management, access to self-employment: NOT APPLICABLE. SolaraIMPACT does not make or assist in employment decisions, recruitment screening, or performance evaluation of individuals.
- Access to essential private/public services and benefits: NOT APPLICABLE
- Law enforcement: NOT APPLICABLE
- Migration, asylum and border control management: NOT APPLICABLE
- Administration of justice and democratic processes: NOT APPLICABLE

CONCLUSION: SolaraIMPACT does NOT qualify as a high-risk AI system under Article 6 or Annex III of the EU AI Act. None of the high-risk use cases apply to the platform's intended purpose of marketing and PR workflow automation.

## SECTION 6: RISK CLASSIFICATION DETERMINATION

CLASSIFICATION: LIMITED RISK AI SYSTEM

Basis for classification:

SolaraIMPACT generates AI-produced content (strategic analyses, campaign plans, competitive intelligence reports, pitch decks) that is delivered to professional users. Under Article 50 of the EU AI Act, systems that generate synthetic content with which users interact are subject to transparency obligations.

Specific Article 50 obligations applicable:

- Article 50(1): Users must be informed when they are interacting with an AI system (where not obvious from context)
- Article 50(4): AI-generated content must be marked as artificially generated or manipulated

The platform does not include chatbot functionality of the kind described in Article 50(1) where non-obvious, as the AI nature of SolaraIMPACT is central to its value proposition and is prominently disclosed. However, SolaraCloud AI LLC applies full Article 50 transparency obligations as a matter of best practice and belt-and-suspenders compliance.

## SECTION 7: APPLICABLE OBLIGATIONS SUMMARY

As a Provider of a Limited Risk AI system, SolaraCloud AI LLC's obligations include:

Obligation	Status & Description
Article 50 — Transparency Obligations	APPLICABLE (in force August 2025). Users must be informed when interacting with AI systems, and AI-generated content must be marked as artificially generated.
Article 4 — AI Literacy	APPLICABLE. Staff must have sufficient AI literacy to understand and manage the system appropriately.
Article 53 — GPAI Model Usage	APPLICABLE. Must verify that all GPAI model providers comply with EU AI Act requirements (Anthropic, OpenAI, Google, xAI all verified).
Recital 47 — Voluntary Codes	RECOMMENDED. SolaraCloud AI LLC participates in industry codes of conduct where available.

Not applicable to SolaraIMPACT:

- Article 8-15 (high-risk system requirements: conformity assessment, technical documentation mandated format, notified body involvement, CE marking, EU database registration)
- Article 16 (high-risk provider obligations)

## SECTION 8: GPAI MODEL PROVIDER COMPLIANCE VERIFICATION

SolaraIMPACT integrates the following GPAI models. All providers have been verified as compliant with EU AI Act GPAI obligations:

Provider	Model	Compliance & Certifications
Anthropic	Claude	SOC 2 Type II, ISO 27001, ISO 42001 certified. Committed to no training on API customer data. Zero-retention API.
OpenAI	GPT	SOC 2 Type II, ISO 27001/27017/27018/27701 certified. Committed to no training on API customer data. Zero Data Retention available.
Google	Gemini	SOC 1/2/3, ISO 27001/27017/27018/27701, ISO 42001, FedRAMP High certified. 55-day policy-enforcement retention only; no training on API data.
xAI	Grok	SOC 2 Type II, GDPR/CCPA compliant. Enterprise Terms confirm no use of API data for training.

## SECTION 9: REVIEW AND MAINTENANCE

This assessment shall be reviewed:

- Annually as a minimum
- Upon any material change to SolaraIMPACT's functionality or AI capabilities
- Upon introduction of any new AI module or model provider
- Upon publication of any official guidance that may affect the classification

Document Owner: Mykhaylo Antonovych, CEO, SolaraCloud AI LLC

Next Review Due: March 2027

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**SIGNATURES**

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