Sub-Processor AI Compliance File

SolaraCloud AI LLC — GPAI Model Provider Verification | EU AI Act Article 53

Version 1.0 | March 2026

SECTION 1: PURPOSE

This document records SolaraCloud AI LLC's verification of compliance by the General-Purpose AI (GPAI) model providers integrated into the SolaraIMPACT platform. Under Article 53 of the EU AI Act, providers of AI systems that integrate GPAI models must verify that those providers meet applicable obligations. This file constitutes SolaraCloud AI LLC's ongoing compliance record for that purpose.

Providers covered: Anthropic (Claude), OpenAI (GPT), Google (Gemini), xAI (Grok)

Last verified: March 2026

Next review: March 2027

SECTION 2: ANTHROPIC, PBC (CLAUDE)

2.1 Company Information

Name: Anthropic, PBC

Headquarters: San Francisco, California, USA

Trust & Security: trust.anthropic.com

2.2 Models Used in SolaraIMPACT

Claude Sonnet 4.6 (primary analysis and content generation)

Claude Opus 4.6 (complex strategic analysis)

2.3 Security Certifications (verified March 2026)

SOC 2 Type II: Confirmed — trust.anthropic.com

ISO 27001: Confirmed

ISO 42001 (AI Management): Confirmed — first major LLM provider to obtain AI-specific certification

CSA STAR: Confirmed

GDPR Compliant: Confirmed

2.4 Data Handling Commitments

No training on API customer data: Confirmed in Anthropic Commercial Terms of Service. "Anthropic will not use Customer's Inputs or Outputs to train its models."

Data retention: Zero retention on API calls. Prompts and responses not stored after processing.

EU AI Act compliance: Anthropic maintains compliance program for GPAI obligations.

2.5 Contractual Basis

Data Processing Agreement: Anthropic's standard DPA / Commercial Terms of Service

API access: Direct API (api.anthropic.com) under Anthropic's Commercial Terms

SECTION 3: OPENAI, LLC (GPT)

3.1 Company Information

Name: OpenAI, LLC

Headquarters: San Francisco, California, USA

Trust & Security: trust.openai.com

3.2 Models Used in SolaraIMPACT

GPT-5.2, GPT-5.3 (specialized analysis and alternative perspective generation)

3.3 Security Certifications (verified March 2026)

SOC 2 Type II: Confirmed — trust.openai.com

ISO 27001: Confirmed

ISO 27017 (Cloud Security): Confirmed

ISO 27018 (Cloud Privacy): Confirmed

ISO 27701 (Privacy Information Management): Confirmed

CSA STAR: Confirmed

GDPR Compliant: Confirmed

3.4 Data Handling Commitments

No training on API customer data: Confirmed in OpenAI Business Terms. API data not used for model training by default.

Data retention: API data retained up to 30 days for abuse monitoring, then deleted. Zero Data Retention (ZDR) option available and used.

IP ownership: "You retain your ownership rights in Input and own the Output. We hereby assign to you all our right, title, and interest, if any, in and to Output."

3.5 Contractual Basis

OpenAI Business Terms of Service; Data Processing Agreement

SECTION 4: GOOGLE LLC (GEMINI)

4.1 Company Information

Name: Google LLC

Headquarters: Mountain View, California, USA

Certifications: cloud.google.com/gemini/docs/discover/certifications

4.2 Models Used in SolaraIMPACT

Gemini Flash (search-integrated analysis, market research)

Gemini Pro (competitive intelligence, comprehensive research)

4.3 Security Certifications (verified March 2026)

SOC 1/2/3: Confirmed

ISO 27001/27017/27018/27701: Confirmed (all four)

ISO 42001 (AI Management): Confirmed

HITRUST CSF: Confirmed

PCI-DSS v4.0: Confirmed

FedRAMP High: Confirmed — most comprehensive certification portfolio

CSA STAR: Confirmed

FINMA (Swiss): Confirmed

GDPR Compliant: Confirmed

4.4 Data Handling Commitments

No training on API customer data: Confirmed in Gemini API Terms of Service. API data not used to train or fine-tune Google models.

Data retention: API inputs/outputs stored for 55 days for policy enforcement only, then deleted. Not used for model improvement or training.

EU AI Act: Google maintains compliance program for applicable GPAI obligations.

4.5 Contractual Basis

Google Cloud Platform Terms of Service; Gemini API Terms of Service; Google Cloud Data Processing Addendum

SECTION 5: XAI (GROK)

5.1 Company Information

Name: xAI (incorporated as X.AI Corp)

Headquarters: Palo Alto, California, USA

Security: x.ai/security

5.2 Models Used in SolaraIMPACT

Grok 4 Fast (real-time web search, news analysis, social media intelligence)

5.3 Security Certifications (verified March 2026)

SOC 2 Type II: Confirmed — x.ai/security

GDPR Compliant: Confirmed

CCPA Compliant: Confirmed

Note: ISO certifications not yet published; narrower certification portfolio than other providers.

5.4 Data Handling Commitments

No training on API customer data: Confirmed in xAI Enterprise Terms of Service. "xAI shall not use User Content for any internal AI or training purposes."

Data retention: 30-day deletion window post-termination. Zero Data Retention option available for enterprise.

IP ownership: Enterprise Terms govern — xAI does not claim ownership of customer outputs.

5.5 Contractual Basis

xAI Enterprise Terms of Service; xAI Data Processing Addendum

SECTION 6: ADDITIONAL SUB-PROCESSORS

6.1 Microsoft Azure

Role: Cloud infrastructure (hosting, database, storage, compute)

Certifications: SOC 1/2/3, ISO 27001/27017/27018/27701, ISO 42001, HITRUST, PCI DSS, FedRAMP, and others

Data handling: Microsoft Azure Data Processing Addendum; GDPR compliant

Azure acknowledged as subservice organization in SolaraCloud AI LLC's SOC 2 Type II report.

6.2 Clerk, Inc.

Role: User authentication and identity management

Certifications: SOC 2 Type II certified

Data handling: Clerk Data Processing Agreement; GDPR compliant

6.3 Stripe, Inc.

Role: Payment processing

Certifications: PCI-DSS Level 1, SOC 1/2, ISO 27001

Data handling: Stripe Data Processing Agreement; GDPR compliant

Note: No payment card data is stored by SolaraIMPACT; all payment data handled directly by Stripe.

6.4 Google LLC (Google Analytics)

Role: Website analytics (marketing site only; not used on the SolaraIMPACT platform itself)

Data processed: Anonymous usage data from solaracloud.ai marketing website visitors

Certifications: As listed in Section 4.3

SECTION 7: CERTIFICATION COMPARISON TABLE

Provider	SOC 2	ISO 27001	ISO 42001	FedRAMP	GDPR	No Training
Anthropic	Yes	Yes	Yes	No	Yes	Yes (zero retention)
OpenAI	Yes	Yes	No	No	Yes	Yes (ZDR available)
Google	Yes (SOC 1/2/3)	Yes (all)	Yes	Yes (High)	Yes	Yes (55-day policy only)
xAI	Yes	No	No	No	Yes	Yes (Enterprise)
Microsoft Azure	Yes	Yes	Yes	Yes (High)	Yes	N/A (infrastructure)

SECTION 8: REVIEW SCHEDULE

This file is reviewed:

Annually (minimum), next review March 2027

Upon any provider certification change or security incident

Upon addition of any new AI model provider

Document Owner: Mykhaylo Antonovych, CEO

Version: 1.0 | March 2026