EU AI Act classification (Regulation (EU) 2024/1689)

This English version is a convenience translation. In the event of any discrepancy, the German version shall prevail.

Provider assessment to support your own evaluation, as of October 22, 2026. Not legal advice. Takes into account the amendment by Regulation (EU) 2026/1744 (Digital Omnibus on AI), in force since July 27, 2026: the obligations for high-risk systems under Annex III apply from December 2, 2027; Art. 4 requires appropriate measures to promote AI literacy. Please check the legal position at the time of introduction.

Summary

In the provider's assessment, Ordyse is **not a high-risk AI system** within the meaning of Annex III no. 4 of the AI Act, because it neither makes decisions on employment relationships, nor allocates tasks based on the behavior of individual persons, nor monitors or evaluates the performance or behavior of employees. This limit is technically enforced (see below).

Functions and classification

Function	Use of AI	Classification
Detection of exceptions	Rules on order and master data	No AI within the meaning of the Regulation required
Extraction of information from emails	Rules, optionally a language model	AI system with limited risk, no assessment of persons
Root causes and patterns	Statistical analysis	Relates to sales orders, customers, items
Resolution agent	Templates, optionally a language model for drafting	Proposals with human approval
Questions in natural language	Rules, optionally a language model	Read-only, only approved views without personal reference
Forecast per case	Statistical model on case data	Relates to deliveries, invoices, sales orders, not to persons
Automations, custom apps	Rules defined by customers	No AI, relates to cases
Task mining (optional)	No AI, time measurement per approved application	No assessment of persons, only teams with five or more devices

Technically enforced limits

- No per-person metrics, no rankings, no handling times per person.
- Pseudonymization of employees with a key held by the customer.
- Analyses only for groups of at least five cases.
- No recording of screen content, window titles, keyboard or mouse input. Task mining only measures the duration of approved applications and only shows teams with five or more devices.
- No emotion recognition (Art. 5(1)(f) AI Act).
- Approval requirement for every action of the agent.

Obligations you still have as a deployer

1. **AI literacy (Art. 4):** You take measures to ensure that persons operating Ordyse understand how it works and its limits. Ordyse provides introductory videos and training material for this purpose. Keep a record of who was trained and when.
2. **Transparency towards customers:** Emails are reviewed and approved by your employees. As a deployer, you have no labeling obligation under Art. 50(4) for business emails, because they do not serve to inform the public. Obligations under Art. 50(2) apply to the provider. You decide whether to mention the use of AI in your communication. If you already use a label for AI-generated content, it can be added to the signature of the proposals.
3. **Informing employees and the works council:** Regardless of the classification, informing them early is recommended. The works council agreement template and the employee information notice are enclosed.

If you change the scope

Anyone who uses Ordyse with their own extensions to evaluate employees departs from the intended purpose described here. A new classification is then required, and the obligations for high-risk systems may apply (including Art. 26(7): informing workers' representatives before putting the system into service). Ordyse does not offer such functions.