

# 01 - HREVN Flash Triage Report

Quick reading for counsel based on the initial AI intake.

<b>Client</b>	DemoChatBot Ltd.
<b>System</b>	DemoChatBot Assistant
<b>Date</b>	2026-05-02T08:45:11.754414+00:00
<b>Version</b>	HREVN_INTAKE_CASE_v0.1
<b>Status</b>	Documentary follow-up required
<b>Legal note</b>	Demo document / reduced intake form / not legal advice

HREVN demo · reduced intake form · not a full review

## Commercial chatbot with transparency and operational-control gaps

DemoChatBot uses an external conversational assistant to handle commercial enquiries and qualify leads. The case shows partial AI notice, informal human escalation and incomplete evidence on processed data, provider controls and response review.

**Risk:** Transparency gap   **Module:** Commercial chatbot and transparency   **Sector:** Commercial website chatbot

**Urgency:** Medium   **Legal review:** Not yet

### Reading for counsel

User notice, human escalation, provider review and conversation traceability should be reinforced before relying on a stronger documentary posture.

### Client-safe summary

The chatbot is already operating in a real use case, but documentary implementation is still partial across transparency, operational control and evidence.

### Main alerts

- Commercial chatbot / transparency use detected: review user notice, data handling and operational controls.
- The AI-interaction notice remains partial or not visible enough.
- There is still no sufficient basis for processed data, privacy or conversation traceability.
- No formal human-escalation procedure is documented.
- No periodic review of sensitive responses or formal incident register is documented.

### Recommended next steps

- Confirm the real scope of the chatbot and whether it collects contact or commercial-need data.
- Review notice visibility on mobile and desktop.
- Review data categories, privacy notice and conversation logging.
- Formalise when a person must intervene and who reviews problematic conversations.
- Create periodic response review and an operational incident register.

## **Detected gaps**

- The AI-interaction notice remains partial
- There is still no sufficient basis for chatbot data categories or privacy
- Conversation traceability or retention remains unclear
- No formal human-escalation procedure is documented
- No periodic review of sensitive chatbot responses is documented
- No formal chatbot incident register is in place
- No clear provider-instruction record
- No AI literacy or internal instruction record

## **Suggested routes**

- AI-interaction notice
- Privacy and data categories
- Conversation traceability
- Evidence register
- Human escalation
- Incident register
- Provider review and usage limits
- AI literacy and internal guidance

## **Suggested professional services for counsel**

- Documentary case triage
- Chatbot AI-interaction notice and transparency materials
- Chatbot privacy and data-category review
- Conversation and incident register
- Chatbot human-escalation procedure
- Provider, instructions and usage-limit review
- Internal chatbot policy and operational guidance

## **Weak or partial evidence**

- Basic chatbot provider guide
- Partial screenshot of the AI interaction notice

- Internal note on conversation retention
- Chatbot incident register

## **Preliminary legal basis triggered by triage**

- Article 4 · chatbot-specific AI literacy
- Article 50 · clear AI-interaction notice
- Article 50 · notice visibility across channels
- Article 26 · provider instructions and usage limits
- Operational control · human escalation and conversation review
- Operational control · chatbot traceability and incidents

## **Quick case sheet**

- Client country: IE
- Deployment stage: Production
- Declared uses: External customer-facing chatbot, Lead qualification
- Review status: Documentary follow-up required
- Legal review: Not yet
- Evidence status: Partial
- Complexity: Medium

This document forms part of an HREVN demonstration generated from a reduced intake form and a limited subset of the legal matrix applicable to the EU AI Act. It is meant to show the documentary workflow and does not amount to a full review based on the complete set of questions, checks and legal provisions that a real file would require. A full review needs broader information and will usually produce a longer document.