

Governance Report ? AI-assisted rental applicant risk as

HumanOSE ? governance preparation, assurance support and audit-ready evidence. No legal compliance certification.

Product:	HumanOSE
Use Case:	uc_cx_a01 (v2)
Source system:	causax
Language:	EN
Data mode:	synthetic
Generated at:	2026-09-04T06:34:52.671Z
Report status:	Active
Integrity hash:	cdbd840297147f41...

This report is based exclusively on synthetic data (pilot operation). No real personal data.

This report does not certify legal compliance.

Executive summary

An AI-assisted process prepares a structured, explained and uncertainty-flagged assessment for the rental decision (completeness of documents, plausibility and risk indicators). The pilot uses synthetic profiles only; the assessment model itself is not implemented in the pilot but is governed.

Intended purpose:	Clarified (v2): Automated individual decisions are technically and organizationally excluded; the appeal channel for affected persons is part of the operating concept.
Preliminary risk class:	Near high-risk ? mandatory human oversight, external legal review recommended
Human oversight required:	Yes
Governance Readiness:	2/16 Controls with evidence/reviewed

Governance Readiness denotes the degree of preparation (evidence in place/reviewed) ? it does not certify conformity.

Use case profile

Intended purpose:	Clarified (v2): Automated individual decisions are technically and organizationally excluded; the appeal channel for affected persons is part of the operating concept.
Affected groups of persons:	natuerliche_personen_mietinteressenten, mitarbeitende_verwaltung
Data sources:	personenbezogen_selbstauskunft, personenbezogen_unterlagen_metadataten, objektdatein
AI function:	screening_support, recommendation
Potential impact:	zugang_essentielle_leistung, oekonomisch_personenbezogen,

	diskriminierungsrisiko_zu_pruefen
Jurisdiction:	eu-de
Source system:	causax
Lifecycle state:	Active

Risk assessment (preliminary)

Preliminary risk class:	Near high-risk ? mandatory human oversight, external legal review recommended
Confidence of the assessment:	medium
Ruleset:	v0.1.0
Human review required:	Yes

The risk classification is preliminary and does not replace a legal assessment.

Reasoning (rule reference)

- R-HIGH-SCREEN-01 ? Screening of natural persons affecting access to an essential service (housing) ? near high-risk constellation, mandatory human oversight.
- R-ELEV-ECON-01 ? Economic impact on natural persons ? decision support requires human approval of effective steps.
- R-ELEV-PII-01 ? Processing of personal data sources ? GDPR principles (purpose limitation, data minimization, data subject rights) must be applied.
- R-LIM-TRANSPARENCY-01 ? Generative or recommending AI function ? transparency and labeling obligations must be reviewed.

Open legal questions

- Is access to housing to be classified as an essential private service within the meaning of Annex III of the EU AI Act? External legal review recommended; until clarified it is treated as near high-risk.

Recommended risk mitigations

- Mandatory human review of every individual-case assessment by a named accountable person.
- Bias review and monitoring of the assessment logic before and during use.
- Establish an appeal/correction channel for affected persons (Incident & Appeal Register).
- Data minimization: process only governance-necessary categories, no copies of raw data.
- Every effective action (booking, decision, notification) is approved by a human.
- Role-based access control and audit events for every access to sensitive objects.
- Label AI-generated content as such; escalation to a human is possible at any time.
- Obtain external legal review before any real use (near high-risk constellation).

Uncertainty of the assessment

Rule set v0.1 works with internal review heuristics on the EU AI Act, GDPR, Swiss DSG and the UK context. The assessment depends on the completeness of the registry entries and does not replace a legal review.

Policy & control overview

The control status documents the review of the evidence ? it does not certify conformity.

Control	Reference	Status	Evidence
Check for prohibited practices	EU AI Act Art. 5	Open	0
Risk management system	EU AI Act Art. 9	Open	0

Data governance	EU AI Act Art. 10	Open	0
Technical documentation	EU AI Act Art. 11 / Annex IV	Open	0
Record-keeping / logging	EU AI Act Art. 12	Open	0
Transparency & labeling	EU AI Act Art. 13 / 50	Open	0
Human oversight	EU AI Act Art. 14	Reviewed (evidence)	1
Accuracy, robustness, cybersecurity	EU AI Act Art. 15	Open	0
Lawfulness of processing	DSGVO Art. 6	Open	0
Data minimization	DSGVO Art. 5(1c)	Evidence attached	1
Data protection impact assessment (DPIA)	DSGVO Art. 35	Open	0
Data subject rights	DSGVO Art. 12-22	Open	0
Bias monitoring	SysTec Policy AI-BIAS-01	Open	0
AI literacy of those involved	EU AI Act Art. 4	Open	0
Access control	ISO 27001 A.9 (Referenz)	Open	0
Audit/evidence chain	SysTec Evidence Standard	Open	0

Open gaps

- Check for prohibited practices
- Risk management system
- Data governance
- Technical documentation (Annex IV-like)
- Record-keeping / logging
- Transparency & labeling
- Accuracy, robustness, cybersecurity
- Lawfulness of processing
- Data protection impact assessment (DPIA)
- Data subject rights
- Bias monitoring
- AI literacy of those involved
- Access control
- Audit/evidence chain

Human oversight

Responsible human:

actor_klaus

Reviewer:

actor_klaus (reviewer)

Human responsibility remains mandatory; AI does not make automatic decisions about persons.

Review history

Timestamp	Reviewer	Decision
2026-07-10T11:52:53.672Z	actor_klaus	Changes required
2026-07-10T11:52:53.706Z	actor_klaus	Approved by human review
2026-07-10T11:52:53.718Z	actor_klaus	Approved by human review

Evidence summary

Evidence chain status: invalid (suspected tampering)

Number of evidence events: 65

Verification passed: No

Simulated anchoring (PageCipher integration pending) ? marked as a simulation.

#	Timestamp	Actor	Action	Hash
558	2026-09-02T19:00:07.8	actor_system_humano	generate_report_ge	d46cd598fdf2...
576	2026-09-02T19:00:36.2	actor_system_humano	generate_report_ge	bbdb69c06403...
594	2026-09-02T19:06:24.9	actor_system_humano	generate_report_ge	e48cd799d55a...
612	2026-09-02T19:07:36.4	actor_system_humano	generate_report_ge	3845e954c718...
614	2026-09-02T19:07:38.0	actor_system_humano	generate_report_ge	baa7ad2e3726...
616	2026-09-02T19:07:39.4	actor_system_humano	generate_report_ge	0f26babf9e72...
622	2026-09-02T19:07:42.1	actor_system_humano	generate_report_ge	c3f402a97c4f...
648	2026-09-02T19:07:48.7	actor_system_humano	generate_report_ge	e6386fd9b60c...
666	2026-09-02T19:07:56.7	actor_system_humano	generate_report_ge	4efb8ea00fa9...
674	2026-09-02T19:07:58.6	actor_system_humano	generate_report_ge	e18b35d8602a...
692	2026-09-04T04:53:43.2	actor_system_humano	generate_report_ge	ce672229e052...
696	2026-09-04T04:54:26.5	actor_system_humano	generate_report_ge	6f8a7c8a6673...
726	2026-09-04T05:42:26.5	actor_system_humano	generate_report_ge	d326a38934ad...
776	2026-09-04T06:34:42.9	actor_system_humano	generate_report_ge	6dc74c9c68fd...

PageCipher anchor status

PageCipher integration status: Active (HTTP integration with PageCipher)

PageCipher anchor status: 39/65 Anchored

PageCipher anchor reference: pagecipher:2c25260d08b829c022ebab64e1ce89ea

Last anchoring attempt: 2026-09-04T06:34:42.924Z

The PageCipher anchor proves the integrity and provenance of the evidence ? it does not certify legal compliance.

Open risks & gaps

- 14 open controls without evidence
- Is access to housing to be classified as an essential private service within the meaning of Annex III of the EU AI

Act? External legal review recommended; until clarified it is treated as near high-risk.

Legal notices (disclaimer)

- This report does not certify legal compliance.
- The risk classification is preliminary and does not replace a legal assessment.
- The legal assessment may require a specialized legal review.
- This report serves governance and compliance preparation on an evidence basis. It does not constitute legal advice, certification, or a conformity attestation.
- Human responsibility remains mandatory; AI does not make automatic decisions about persons.

Appendix

Control catalog		
Control	Source	Reference
Check for prohibited practices	eu_ai_act	EU AI Act Art. 5
Risk management system	eu_ai_act	EU AI Act Art. 9
Data governance	eu_ai_act	EU AI Act Art. 10
Technical documentation (Annex IV-like)	eu_ai_act	EU AI Act Art. 11 / Annex IV
Record-keeping / logging	eu_ai_act	EU AI Act Art. 12
Transparency & labeling	eu_ai_act	EU AI Act Art. 13 / 50
Human oversight	eu_ai_act	EU AI Act Art. 14
Accuracy, robustness, cybersecurity	eu_ai_act	EU AI Act Art. 15
Lawfulness of processing	gdpr	DSGVO Art. 6
Data minimization	gdpr	DSGVO Art. 5(1c)
DPIA / Data protection impact assessment	gdpr	DSGVO Art. 35
Data subject rights	gdpr	DSGVO Art. 12-22
Bias monitoring	internal_policy	SysTec Policy AI-BIAS-01
AI literacy of those involved	ai_literacy	EU AI Act Art. 4
Access control	security	ISO 27001 A.9 (Referenz)
Audit/evidence chain	audit	SysTec Evidence Standard (ADR-003)

Generation metadata

Generated at:	2026-09-04T06:34:52.671Z
Version:	0.1.0
Language coverage:	100 %
Number of evidence events:	779