

CYBERLEGIS USA Inc. — Trusted Data Custodian for Regulated AI & Cross-Border Data Silos

(Operating in USA and Europe)

Mission

CYBERLEGIS acts as a **neutral, independent data custodian** enabling organizations to store, process, and use personal data in compliant “data silos” — including **AI/LLM training** — while preserving **legal control, privacy, and sovereignty** under GDPR, CCPA/CPRA, DPF, and DORA frameworks.

Core Proposition

- **Custody, not use:** CYBERLEGIS maintains **technical and legal custody** over personal-data silos on behalf of enterprises.
- **Depersonalized AI enablement:** When AI/LLM training requires data, CYBERLEGIS releases only **depersonalized or ECJ-“anonymous”** datasets — proven unidentifiable even by the recipient.
- **Supervisory layer:** All data-training actions are logged, audited, and subject to CYBERLEGIS’ **real-time monitoring and compliance attestation**.

Key Services

Service Pillar	Description
1. Data Custody & Governance	Secure, out-of-band control of encryption keys, access approvals, and audit logs. Split-key / M-of-N governance to ensure no unilateral access.
2. Silo Supervision	Oversight of storage and processing; continuous monitoring of access, configuration drift, and privileged operations.
3. AI/LLM Data Enablement	Creation of depersonalized datasets using PETs (tokenization, anonymization, differential privacy, confidential computing). CYBERLEGIS verifies anonymity under ECJ (Breyer/C-582/14) standards .

Service Pillar	Description
4. Custodian-Supervised AI Training	CYBERLEGIS authorizes, supervises, and records each training session by third-party AI providers; maintains immutable audit trails; ensures training confined to permitted purposes.
5. Compliance & Legal Safeguards	GDPR Art. 28 processing, CCPA/CPRA service-provider terms, SCCs/IDTA, TIA/DPIA library, DPF participation, lawful-request playbook.
6. Transparency & Reporting	Monthly custody reports; regulator-ready audit packages; optional ISO 27701 / SOC 2 attestations.

AI & Privacy Compliance Architecture

- **Data Preparation:** All personal data undergoes structured **depersonalization** validated by CYBERLEGIS privacy consultants.
- **Training Execution:** AI vendor trains only within a **custodian-supervised enclave**; no export or retention of identifiers.
- **Monitoring:** Continuous observation of training resource consumption, data lineage, and model-output checks (e.g., for re-identification risk).
- **Legal Safeguards:** Custodian DPA + AI Training Addendum defines roles, retention, anonymization proofs, and incident obligations.
- **Accountability:** Each training event → one cryptographically sealed **audit capsule** containing logs, consents, and anonymization parameters.

Jurisdiction Model

Origin of Data	Data & Key Residency	Applicable Law & Compliance Basis
EU/EEA data	Stored and processed in EU (DE/IE/NL/LU) under CYBERLEGIS RA GmbH, Munich	GDPR, DORA; anonymization per ECJ; SCCs for non-EEA recipients.
US data	Hosted in US under CYBERLEGIS USA Inc.; DPF-aligned; optional EU-US dual realm.	CCPA/CPRA, DPF, NIST Privacy Framework.
Mixed workloads	Dual realm (EEA + US); keys segregated; federated analytics.	Both GDPR & CPRA compliance via custodian attestation.

Value to Clients

- Enables **AI innovation** with zero regulatory exposure for controllers.
- Provides **defensible legal architecture** for international transfers & AI training.
- Delivers **tamper-proof audit evidence** for regulators and clients.
- Reduces Schrems-II risk via **custodian-held keys and depersonalization proof**.

Revenue Model

- **Subscription Custody Fees:** per data silo / tenant / month.
- **AI Enablement Premium:** per depersonalized dataset or supervised training cycle.
- **Compliance Audit Retainers:** annual SOC 2 / ISO 27701 or regulator attestation support.

Legal & Technical Integrity Statement

CYBERLEGIS does **not** use or monetize personal data.

All processing occurs under client instruction, in compliance with **GDPR Art. 28**, **CCPA § 1798.140(v)**, and **ECJ anonymization standards**.

Custodian keys are never accessible to data processors or AI vendors.

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