

Eclipse — Processing Chain and Data Flow

Internal architecture note

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Internal architecture note supporting the Article 30 record and the DPIA

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1. WHY THIS DOCUMENT EXISTS

The Article 30 record names processors in a table. This note shows where each one sits in the chain and what passes through it, so that the record can be checked against reality rather than against intention. Every processor in the chain is a point where client data leaves our control, and each one needs its own assessment.

2. THE CHAIN, STEP BY STEP

Step	What happens	Who touches client data	Data leaving our infrastructure
1	The client speaks with Eclipse	Our application	No
2	Speech is transcribed to text	Gadium (transcription)	Yes — audio, if transcription is cloud-side
3	The transcript informs the response	Mistral AI, EU endpoint	Yes — transcript text
4	Session content is compiled against the chart	Our pipeline, our infrastructure	No
5	The evolutionary run produces a clearing circuit	Our pipeline; the mutation model	Yes — whatever is in the prompt
6	A practitioner reviews and authors the output	Richard	No
7	Documents are delivered	Our email provider	Yes — the finished document

3. THE THREE SPEAKING ROLES, KEPT SEPARATE

There are three distinct jobs in the voice path, and conflating them is how assessments go wrong:

Role	Job	Provider
Speech driver	The language model that decides what to say and composes the response	Mistral AI (EU endpoint)
Speech rendering	Turning text into audible voice	Gadium
Transcription	Turning the client's speech into text	Gadium (confirm)

Mistral is the driver behind Eclipse — the reasoning and the language. Gadium renders the voice. They are separate processors and each is assessed separately.

No client voice is cloned. Eclipse speaks with a catalogue voice, or with Richard's own cloned voice, which is covered by his own consent. No recording of a client is used to build a synthetic version of their voice, so voice biometric data is not processed on the client path and Gadium's voice-cloning consent obligations are not engaged.

If that ever changes, the consent capture set out in the Gadium checklist (section 3) becomes mandatory **before** any upload — because Gadium requires consent contractually without enforcing it technically, which places the obligation squarely on us.

4. THE OPENEVOLVE PROMPT — THE POINT THAT NEEDS THE MOST CARE

The mutation call in an OpenEvolve run receives a **prompt**. Whatever is in that prompt reaches the model provider. If a prompt contains a client's chart, their locked octons, or their clinical narrative, then that material is being processed by the provider, and the provider's DPA and residency govern it.

Two things follow:

1. **The provider of the mutation lane is a processor** for that client's data, and must be named in the Article 30 record like any other.
2. **Data minimisation applies** (Article 5(1)(c)). Send what the run needs and no more. A run does not need a client's name; it needs the structural inputs. Those are different things, and the difference should be visible in the code.

Action. Enumerate every model endpoint the pipeline can reach — including any fallback lane — and list each one in the Article 30 record. A fallback lane that nobody wrote down is still a processor.

5. WHERE CLIENT DATA MUST NOT GO

- **Any development or experiment lane.** DeepSeek, Gemini, Claude, free-tier providers — none of them receives client data. The rule is about the lane, not the provider name.
- **The Gradium default endpoint** (`api.gradium.ai`) for client audio. It is not EU-pinned and can route to a US cluster. Client audio uses `eu.api.gradium.ai` once residency is enrolled — or the on-device / in-VPC option, which removes the cloud processor from the path.
- **Any endpoint without a confirmed region.**
- **Any gateway that forwards to a provider we have not assessed** — including a gateway used for convenience on a lane that was thought to be internal.
- **Any provider with a training opt-out that is unset.**

6. OPEN ITEMS BEFORE CLIENT DATA FLOWS

#	Item	Owner	State
1	Mistral DPA accepted and archived		Open
2	Mistral training opt-out set on both surfaces and evidenced		Done 1 Oct 2026 — screenshots filed
3	Mistral EU endpoint confirmed in config		Open — config to write
4	Gradium Zero Data Retention in force (data retention disabled in Studio); EU residency requested in implicit mode; pinned to <code>eu.api.gradium.ai</code> with pinned; <code>zone=eu</code> asserted in code; ToS Exhibit 1 DPA filed		ZDR done · residency request drafted · DPA obtainable now
5	Gradium on-device (Phonon) or in-VPC (SageMaker) option evaluated for the audio path		Open
6	Hosting and email provider residency confirmed		Open
7	Every OpenEvolve lane, including fallbacks, enumerated		Open
8	Development-lane separation documented: experiments use various LLMs (DeepSeek, Gemini, Claude, free tiers), none carrying client data		Open — position stated by controller
9	Explicit consent capture built and the withdrawal route live		Open
10	Deletion job verified to run at 90 days		Open
11	Gradium subprocessor Clerk (US) assessed — identity data, not session audio; confirm scope or an alternative		Open — transfer to record
12	Establishment decided and evidenced. The Ltd is UK-incorporated and currently non-trading , so the question is dormant until processing begins . Decide before the first client's data is processed, and build UK		Open — dormant; decide before the first client

#	Item	Owner	State
	operating substance (hosting, banking, contracts, actual trading, decisions documented) if UK operation is the intention		
13	Independent Article 27 representative appointed. Follows automatically from UK operation, because Article 27 exists for controllers outside the Union serving EU data subjects. Do not self-appoint		Open — required before the first EU client
14	Lead supervisory authority confirmed — ICO if UK-operated, CNIL if EU-established — and the privacy notice updated to match		Contingent on item 12

7. THE PRINCIPLE

Regional compliance is a property of **every step**, not of the chain as a whole. One unassessed processor anywhere in the path makes the whole path unassessed. The list above is short, and each line is an afternoon's work — but an item left open is an item a regulator will find.

Internal working document. Reviewed alongside the Article 30 record and the DPIA.