

Declaration of EU AI Act Compliance: Kami AI Features (Nov 2025)

1. Scope and Classification Rational

This declaration confirms that the Artificial Intelligence (AI) features offered within the Kami platform are classified as **Minimal Risk** or **Limited Risk** under the EU AI Act (Article 50), and do **not** meet the criteria for a High-Risk AI System (Article 6).

EU AI Act Risk Category	Kami AI Feature Classification	Compliance Obligation Focus
Unacceptable Risk	Excluded	N/A (Prohibited practices)
High Risk (Annex III)	Exempted (per Article 6(3))	Documentation of Exemption (Article 6(4))
Limited Risk	Applicable (Transparency)	Clear and Conspicuous User Notification
Minimal Risk	Primary Classification	N/A (Voluntary Code of Conduct)

2. Exemption from High-Risk Classification (Annex III)

While AI systems in **Education and Vocational Training** are listed in Annex III, Kami’s specific AI features are intended to perform **assistive, non-critical tasks** and therefore qualify for an exemption from the High-Risk requirements, as defined in **Article 6(3)** of the EU AI Act.

Kami AI features are exempt because they fulfil the following conditions:

- **Performs a Narrow Procedural Task (Article 6(3)(a)):** The features are limited to technical functions such as **summarizing text, correcting grammar/spelling, or generating simple explanatory content**. They are not used for complex analysis or profiling.
- **Improves the Result of a Previously Completed Human Activity (Article 6(3)(b)):** The AI acts as an **assistive tool** for teachers and students, designed to enhance

productivity and check preliminary work (e.g., initial drafts, lecture notes). It is not designed to create or issue final, high-stakes assessments, grades, or disciplinary decisions.

- **No Replacement of Human Assessment (Article 6(3)(c)):** The system is **not meant to replace or substantially influence a human assessment** without proper human review.
 - **Crucially:** The student and teacher do **not** directly interact with a General-Purpose AI (GPAI) model (e.g., a direct chatbot interface). The AI's output is integrated as an administrative and pedagogical aid, always subject to the **final and complete oversight of the teacher**.

3. Transparency Compliance (Limited Risk Obligations)

Kami's practices are rigorously aligned with the transparency requirements for Limited Risk AI systems (Article 50), and include both technical and contractual controls to ensure human oversight and institutional choice.

- **Explicit Labeling:** All AI functionality within the Kami app is explicitly identified with visible, contextual labels such as “**Beta**” or “**AI**”. This ensures the user is continually aware that a machine-generated process is being executed.
- **First-Time User Prompt or Activation Acceptance:** A clear and distinguishable prompt, informing users of the AI's presence and function, is presented upon activation:
 - For **individual plans**, this prompt is presented upon a user's first interaction with any AI feature.
 - For **school and institutional plans**, this mechanism is managed centrally during the **setup phase and enshrined in the contract** with the institution.
- **Acceptance Mechanism:** The use of AI is contingent upon the acceptance of this prompt by the individual teacher or by the school administrator, establishing explicit consent and awareness at the point of use.
- **Contractual and Technical Control:**
 - **Contractual Obligation:** The ability for the school to control and restrict AI features is **enshrined in the contractual agreement** with the educational institution.
 - **Technical Disable Function:** The school administrator retains full technical control and the ability to **restrict or entirely disable** all AI features for students and teachers within their institutional account, ensuring that the final deployment decision rests entirely with the school.
- **No Direct Chatbot/Profiling:** There is **no direct, unrestricted chatbot interface or user-facing prompt mechanism** that allows students or teachers to engage directly with the underlying Generative AI model (Gemini). This limits the potential for unforeseen risks associated with open-ended conversational AI.

4. Provider and Data Governance

Kami's role as the deployer of the AI application relies on a General-Purpose AI (GPAI) model (Google Gemini), whose compliance with the core GPAI rules rests with the model provider.

- **GPAI Model Responsibility:** The compliance obligations for the underlying General-Purpose AI model (Gemini), including technical documentation and systemic risk mitigation (where applicable), are the responsibility of the **GPAI Provider (Google)**, not Kami as the deployer.
- **Data Minimisation:** Kami **does not modify or store personal student data** within the underlying AI model for training purposes. All data processing is covered under our Privacy Statement and a GDPR-compliant Data Processing Agreement (DPA).
- **Administrative Control:** The school/administrator has the ability to **restrict or entirely disable** all AI features for students and teachers, confirming institutional oversight and control over the technology's deployment.

5. Conclusion

Based on the documented non-high-risk use cases, the emphasis on human oversight, and the implementation of robust transparency measures, Kami's AI features are classified as **Minimal Risk** under the EU AI Act. Kami has performed and documented this non-High-Risk assessment in accordance with Article 6(4) of the Regulation.

Kami is committed to updating this classification to align with the final enforcement timeline and any forthcoming implementing acts or Codes of Conduct related to AI in education.

Dane Maslen
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