



Where the data of 14,900 customers lives

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Hosting, role-based access, record of processing, traceability · fictional document

Fictional document — demonstration example

This document is produced by the Blue Lemon Agent website to illustrate what an AI agent hands to its users. The companies, matters, amounts and people in it are invented. It has no legal, accounting or commercial value.

Fictional document, produced for the demonstration. **It is written to be handed as it stands to your data protection officer**: every line can be checked against a configuration setting or a log, none rests on a statement of intent.

Where the agent runs — two architectures, one consequence

Architecture	What leaves the authority's network	Exposure to the Cloud Act and FISA 702	When to choose it
Local inference, on a machine of the authority	Nothing. No flow leaves the network.	Reduced to the minimum — no flow leaves the network	Where the authority has a server room and wants total isolation

Architecture	What leaves the authority's network	Exposure to the Cloud Act and FISA 702	When to choose it
Dedicated, isolated resource hosted in France, under French law	Nothing that leaves the territory or the European Union	Reduced by the architecture; location alone is not enough, and the exposure is documented for the configuration chosen	The usual case — operation and updates handled by us
Pooling between authorities	Not practised. An environment strictly dedicated to the Vallée du Cerneuil.	—	—

Access rights, role by role — and the special case of bank details

Resource	Agent's access	Case officers' access	What that rules out in practice
Customer file (identity, supply point address, contract, meter size)	Read only	Read and write	The agent cannot alter any contract or any address
Reading and smart metering log (index, date, night flow)	Read only	Read	No index can be created, corrected or erased by the agent
Resolved tariff grid and service by-law	Read only	Read; changes reserved to the head of customer service	Tariffs are set by resolution of the authority board — the agent reads them, it does not touch them

Resource	Agent's access	Case officers' access	What that rules out in practice
Billing software	No write access	Read and write	The agent produces a file and draft letters; a case officer imports them. No invoice can be issued by the agent.
Direct debit mandates and bank details	Presence-absence only: the agent sees that a mandate exists, that it is signed and that it carries a legible IBAN. It does not see the IBAN.	Read, restricted to two named officers	The agent can tell a customer a document is missing without ever accessing the banking data itself
Reduction decisions and payment plans	Read only	Written by the head of customer service	No reduction and no payment plan can be created by the agent

The bank details line is worth reading twice, because it illustrates the whole principle. Article 5.1.c GDPR requires that only data necessary to the purpose pursued be processed. The purpose here is to tell a customer that their direct debit mandate is incomplete — and for that it is enough to know that an IBAN is present and legible, not to read it. That is the difference between minimising a data item and minimising an access right, and it is the second that can be verified. Every access right in the table above is withdrawn with a word, effective within the second, with no restart and no intervention.

The service's record of processing activities, already drafted

Processing	Purpose	Legal basis	Data processed	Period set by the service
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Answering customer enquiries	Inform and route	Public interest task — art. 6.1.e GDPR	Identity, address, contract, subject of the request	2 years after closure
Preparing the billing	Establish the water and sanitation charge	Public interest task — art. 6.1.e	Contract, time-stamped indexes, tariffs applied	The authority's accounting record retention period
Consumption anomaly notice	Meet the notification duty of art. L. 2224-12-4 III bis	Legal obligation — art. 6.1.c	Contract, index, date and manner of sending, wording of the letter	For as long as the debt it underpins can be disputed
Checking documents attached to requests	Assess a connection, a payment plan, a reduction	Public interest task — art. 6.1.e	Name, address, date of the document, presence and legibility of the required particulars	90 days after the decision — the document image is not kept
Access and output log	Trace who read what, and where each output came from	Security obligation — art. 32	Timestamp, role, reason, contract concerned	3 years

The periods above are those the authority has set in its own record, on a date the record carries. They are not presented as a rule of law: the law sets principles — necessity, minimisation, storage limitation —, the service derives periods from them and owns them. **One exception, and it is named: the consumption notice log is kept for as long as the debt it underpins can be disputed,** because it is the item that decides whether the service had the right to bill the excess

share.

What you produce the day a customer disputes, saying « the machine decided »

Item	What it establishes	Where it is taken from	Time to produce
1 — The calculation	The four readings underpinning the average, their date and index, the double as calculated, the excess volume, and the article of the resolution of 11 December 2025 setting each tariff applied	Reading log + resolved tariff grid	Immediate
2 — The notice, and its date	Date the art. L. 2224-12-4 III bis notice was sent, how it was sent, exact wording. It is the decisive item: failing it, the text finds for the customer automatically. Over the year: 100% sent on the day of observation.	Consumption notice log	Immediate
3 — Who decided	Name of the officer who signed the reduction, date, time and ground relied on. 640 files, 640 named decisions.	Decision log	Immediate
4 — What the customer had been told, and when	The artificial-intelligence disclosure made in the first sentence of every exchange, and the option to ask for a human — 1,326 customers asked, 1,326 got one	Disclosure and transfer log	Immediate

Item	What it establishes	Where it is taken from	Time to produce
5 — The access file, if the customer asks for it	Contract, readings, invoices, letters, payment plan, and the log of the reads made of their file with the reason for each — right of access under art. 15 GDPR	All of the above	One minute — the usual difficulty is gathering the pieces; they are already gathered

The artificial-intelligence disclosure is not a configuration option. Article 50(1) of the EU AI Act has required, since 2 August 2026, that any person interacting with an AI system be informed, unless this is obvious. It is built into the greeting, in the language of the exchange under way — the notice follows the exchange, it does not translate it —, on every channel — phone, website chat, WhatsApp Business, email. **And it is logged: it is that trace which makes it demonstrable, not the statement.**

Architecture adopted — local inference or isolated resource hosted in France — settled on: _____

Date of the annual review with the data protection officer: _____

Scope of this document: the service operated by Blue Lemon Agent. For an agent deployed at your premises, the applicable location is that of the architecture set out in the quotation and verified before commissioning; local execution is announced only for the configuration explicitly described and accepted in the quotation; the applicable isolation depends on the deployment mode set out in the quotation, no dedicated isolation being presumed; the encryption mechanisms in transit and at rest, their components and key management are those documented for the architecture chosen; roles and permissions are configured and accepted for the identities and systems actually connected; the events logged, their content, their retention period and who may access them are defined for the deployment chosen.