fruggr | AI Pulse

RESPONSIBLE AI OBSERVATORY

AI DISCLOSURE

Public Registry of AI Applications

Transparency on how Digital4Better uses & governs artificial intelligence

An official disclosure published by **Digital4Better**, the company behind **Fruggr** — for a more responsible, transparent and accountable use of AI.

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01 AI put to the test of our convictions

At Digital4Better, technological innovation is inconceivable without responsibility. Since our founding, we have been working to ensure that digital technology and AI serve everyone and respect our planet. Whether through our consulting services or our Fruggr SaaS solution for digital responsibility and AI governance, we support organizations on a daily basis in their AI and digital transformation.

For a company whose mission is to make digital technology more responsible, the use of AI is no trivial matter; it requires us to remain true to our principles every day. We have chosen to try to understand the technology from the inside, manage its risks, and continue to support our clients with the same standards we apply to ourselves. Because the best way to advise on the efficient use of AI is to experience it firsthand—in a pragmatic, clear-eyed way, without shying away from the contradictions.

This document is our response to that commitment. It lists the AI use cases that Digital4Better uses or develops, describes our governance approach, and formalizes the commitments that guide our practices. In the spirit of full transparency, we are making it public.

02 Our vision of governance: test, arbitrate, structure

Like many organizations, we started by experimenting. Since 2023 , the Digital4Better teams have been exploring the AI solutions available on the market—from code assistants for developers and transcription tools for sales teams to audience analysis tools for marketing teams.

With a clear focus on collective learning, the goal is not to deploy these tools as quickly as possible, but to gain a concrete understanding of what these technologies can bring to our operations and what risks are involved.

This exploration phase leads to an ongoing evaluation process: which use cases to adopt, which to discard, and based on what criteria? Business value, financial cost, environmental footprint—we are building a decision matrix that we apply to each new use case .

At the same time, we are structuring the adoption of these tools within a controlled framework and training employees in the responsible use of AI. In addition to the internal appointment of a Chief AI Officer, each business unit is supported by an AI ambassador who promotes best practices.

Above all, this approach is company-wide. To rethink our organization and our processes with AI, our executive committee has access to key metrics on a daily basis.

This approach is iterative by design. The technological landscape is evolving, regulations are becoming more specific, and our practices are changing. This document is a testament to that transformation.

03 Why an AI Disclosure?

To be transparent with our clients and partners

Artificial intelligence is gradually being integrated into our operations, whether it involves drafting a response to a request for proposal or developing a feature in Fruggr. Aware of the concerns raised regarding data privacy and the reliability of our practices, we have decided to be transparent. In an era of hidden practices and intellectual services devoid of human touch, communicating in this way is our way of maintaining the trust of our clients and partners.

Initiating a compliance process

Since February 2025, the first obligations of the EU AI Act (European Regulation on AI or RIA) have been in effect. While the Omnibus Regulation (Digital Omnibus on AI) is expected to shift the timeline, postponing the issue of AI compliance would be a strategic mistake. The GDPR, fully applicable since 2018, already governs all processing of personal data, including that initiated by AI systems. The two regulations reinforce each other and share the same fundamental requirement: knowing the tools you use and understanding how they are used. This AI Disclosure is the first step in any compliance process.

Paving the way

At a time when AI uses remain largely unreported, publishing this document is a deliberate act. We believe that transparency should become the norm, not the exception. By making this registry public, we hope to contribute to a collective movement and encourage other organizations to do the same. The creation and maintenance of the registry, as well as the publication of this AI Disclosure, are made possible by the “AI Governance” module of our Fruggr solution.

04 Our approach to regulations (RIA)

The European AI Regulation classifies AI systems (AIS) by risk level. The more an AIS is likely to affect the fundamental rights of European citizens, the higher the applicable requirements. These range from no obligations for AIS with minimal risk to a ban on deployment for AIS with unacceptable risk.

These requirements also vary depending on the role we play with regard to these IT systems. Digital4better acts, depending on the situation, as a provider—when we develop and market an IT system (e.g., the AI features integrated into Fruggr) and —and/or as a deployer—when we use it in our internal operations (e.g., AI-automated meeting minutes).

RISK LEVEL	SUPPLIER	DEPLOYER	LEGAL REFERENCE
UNACCEPTABLE	Prohibition on developing and marketing the SIA	Prohibition on using the SIA	Art. 5 RIA
HIGH RISK	Requirements related to the design of the SIA: technical documentation, risk management, declaration of conformity, ...	Obligations related to the use of the SIA: human supervision, compliance with the user manual, impact analysis, ...	F: Section 2 & Art. 16 RIA D: Art. 26 RIA
LIMITED RISK	Transparency requirements	Transparency requirements	Art. 50 RIA
MINIMAL	No specific obligations	No specific requirements	Art. 95 RIA

05 Our AI Registry

Digital4Better lists 20 AI use cases that have been deployed or are currently under development. Detailed fact sheets for each use case (processed data, AI solution used, regulatory role) are available in Appendix I of this document.

USER ENTITY	USE CASE	STATUS	RIA RISK LEVEL
CROSS-FUNCTIONAL	AI Governance	DEPLOYED	Minimal
CROSS-FUNCTIONAL	AI support for everyday individual productivity tasks	DEPLOYED	Minimal
CROSS-FUNCTIONAL	Internal meeting minutes	BUILD	Minimal
CROSS-FUNCTIONAL	Strategic and competitive intelligence	BUILD	Minimal
CROSS-FUNCTIONAL	Training and skill development	BUILD	Minimal
CROSS-FUNCTIONAL	Reports — Customer Relations	BUILD	Minimal
Consulting Team	Assistance with drafting responses to requests for proposals	BUILD	Minimal
Consulting Team	Production of consulting deliverables	BUILD	Minimal
Support Team	Customer Support (CCM/CSM)	DEPLOYED	Minimal
Support Team	Fruggr Documentation and Communication	BUILD	Minimal
Product Team	Fruggr Development	DEPLOYED	Minimal
Product Team	Product Discovery	BUILD	Minimal
Services Team	Customer Development and Maintenance	DEPLOYED	Minimal
Services Team	Client Technical Consulting	BUILD	Minimal

USER ENTITY	USE CASE	STATUS	RIA RISK LEVEL
Sales Team	Sales Prospecting	BUILD	Minimal
Marketing Team	Marketing Strategy and Content Production	BUILD	Minimal
HR Team	HR Management	DEPLOYED	Minimal
HR Team	Application Processing	IDEA	High
Fruggr customers	AI embedded in the product (Accessibility module)	DEPLOYED	Limited
Fruggr customers	AI embedded in the product (AI Governance module)	BUILD	Minimal

06 Our AI tools

The table below lists the main AI-integrated tools used by Digital4Better. The processing of personal data by these tools is addressed in our GDPR governance framework. Details by use case are provided in Appendix I.

TOOL NAME	PROVIDER	PRIMARY USE
Claude	Anthropic	General-purpose LLM
Le Chat	Mistral	General-purpose LLM
GitHub Copilot	GitHub / Microsoft	Development assistance
Cursor	Cursor	Development assistance
Claude Code	Anthropic	Development support
Codex CLI	OpenAI	Development support
Copilot	Microsoft	Meeting transcription and summary (Teams)
Typeless	Typeless	Meeting transcription and summary
Perplexity	Perplexity AI	Augmented web search

07 Digital4Better's commmitments to the responsible use of all

These commitments formalize the principles that guide the use of AI at Digital4Better. They are excerpted and summarized from our internal charter. In addition to continuous monitoring by our Chief AI Officer, the implementation of these principles is directly integrated by design into our tools (administrator settings, skills, prompt systems).
See the list of these commitments in Appendix 2

CONCLUSION

AI does not succeed behind closed doors. It succeeds in an ecosystem of trust, with partners, clients, and employees who understand what it does—and why.

That is why this AI Disclosure exists. Not because we were asked to do so. Because we believe that a responsible AI transformation is built on transparency, above all else. Without it, there is no trust. Without trust, there is no lasting transformation.

Writing this document was not easy. Every line raised a question: how far should we go? What should we share, and what should we protect? How do we navigate between the demand for transparency and the real risks of disclosure, in a regulatory environment that is still evolving? There is no perfect answer to these questions. There are choices we have made, which we continually reassess.

This first version isn't perfect. We know that. But it's honest—and it's here.

We will improve it. With you, as standards evolve, and as we gain experience together. That is the point of this approach: not to wait until we are flawless to be transparent, but to move forward openly, in good faith.

Responsible, transparent, and secure use of AI is not a constraint. It is what makes success possible—for us, and for those who trust us.

APPENDIX 01:
Detailed sheets by use case

The sheets below detail each use case listed in Digital4Better's AI registry. They provide the information necessary to understand our governance.

Reading Guide

Functional description: what the AI system actually does in this context: the task performed, the inputs processed, the output produced.

User: the team or entity using the AI system: this may be an internal D4B team or Fruggr clients.

RIA Risk Level: the risk level assigned to the use case according to the RIA classification.

RIA role: D4B's role according to the RIA classification

AI processing type: the AI technique(s) used in this use case (e.g., generative LLM, classification, RAG, STT…).

AI Solution: the solution(s) used or tested for this use case and their provider.

Nature of data processed: The categories of data that feed the AI system in this use case.

Personal data: Indicates whether personal data as defined by the GDPR (Art. 4) is processed in this use case.

Affected individuals: The individuals who may be affected by the system—through a decision, a recommendation, an analysis, etc.

Status: Use case maturity level:

- Idea (ongoing discussion of business needs and justification)
- In development (testing and tool evaluation phase)
- Deployed (in production, used by teams).

7.1 AI Governance

CROSS-FUNCTIONAL · Minimal · DEPLOYED

Use of AI to structure D4B's AI governance: mapping of use cases, regulatory risk assessment, and production of AI Act and GDPR compliance documentation.

RIA role	Deployer	Personal data	Yes
AI processing type	Generative LLM	Affected individuals	Employees
AI solution	Claude (Anthropic); Le Chat (Mistral)		
Type of data processed	Internal textual data (policies, charters, records) · Public data (regulatory texts, case law)		

7.2 Assistance in drafting responses to requests for proposals

CONSULTING TEAM · Minimal · BUILD

Analysis of requests for proposals and generation of responses (technical and commercial questions, materials in all formats). The system relies on internal D4B documentation and public data related to the client.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · RAG	Affected individuals	N/A
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (service offerings, references, client case studies) · Public data (specifications, client profiles)		

7.3 Customer Support (CCM/CSM)

SUPPORT TEAM · Minimal · DEPLOYED

AI-powered assistance for Fruggr support teams (CCM/CSM) to diagnose issues, resolve tickets, and analyze application data. The system operates in read-only mode on client environments and has limited write access to internal tracking tools.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · AI agents / orchestration	Affected individuals	N/A
AI solution	Claude (Anthropic)		
Type of data processed	Technical data (logs, application metrics) · Communication data (support tickets) · Business data (customer account data)		

7.4 Fruggr Documentation

SUPPORT TEAM · Minimal · BUILD

Production and updating of user documentation (wiki, manuals, release notes, product announcements).

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM	Affected individuals	Fruggr users
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (product specs, release notes, repositories, marketing briefs, personas)		

7.5 Fruggr Development

PRODUCT TEAM · Minimal · DEPLOYED

AI assistance for Fruggr developers for code completion, refactoring, debugging, code review, and test generation. Multiple solutions coexist intentionally to limit reliance on a single vendor.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · AI agents / orchestration	Affected individuals	N/A
AI solution	GitHub Copilot (GitHub/Microsoft) · Cursor (Cursor) · Claude Code (Anthropic) · Codex CLI (OpenAI)		
Type of data processed	Technical data (Fruggr proprietary source code)		

7.6 Customer Technical Advisory

SERVICES TEAM · Minimal · BUILD

AI-assisted technical analysis and generation of architecture recommendations as part of development projects for clients.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · RAG	Affected individuals	Customers
AI solution	Claude (Anthropic) · Le Chat (Mistral)		
Type of data processed	Internal text data (D4B technical repositories) · Client technical data (architecture, code, configurations)		

7.7 Production of consulting deliverables

CONSULTING TEAM · Minimal · BUILD

Assistance with the production of consulting deliverables: audit reports, carbon footprint assessments, environmental analyses, recommendations, and client presentations.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · RAG	Affected individuals	Customers
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (repositories, D4B recommendation database) · Technical and organizational data (client audit data)		

7.8 Internal meeting minutes

CROSS-FUNCTIONAL · Minimal · BUILD

Automatic transcription and summarization of internal meetings (executive committee, team meetings, project updates).

RIA role	Deployer	Personal data	Yes
AI processing type	STT · Generative LLM	Affected individuals	Employees
AI solution	Copilot (Microsoft) · Le Chat (Mistral) · Typeless		
Type of data processed	Audio data (meeting recordings) · Communication data (transcripts, summaries)		

7.9 Sales prospecting

SALES TEAM · Minimal · BUILD

AI-powered assistance for sales teams in prospecting, preparing outreach strategies, and drafting prospecting sequences.

RIA role	Deployer	Personal data	Yes
AI processing type	Generative LLM	Affected individuals	Prospects
AI solution	Claude (Anthropic)		
Type of data processed	Identity data (name, job title, work contact information) · Professional data (company, role, LinkedIn activity signals)		

7.10 Strategic and competitive intelligence

CROSS-FUNCTIONAL · Minimal · BUILD

Research, analysis, and synthesis of strategic and competitive information from public and internal sources.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · RAG	Affected individuals	N/A
AI solution	Le Chat (Mistral) · Claude (Anthropic) · Perplexity		
Type of data processed	Public data (web, data.gouv, industry publications) · Internal textual data (strategic briefs, positioning statements)		

7.11 Product Discovery

PRODUCT TEAM · Minimal · BUILD

Support for product discovery phases: analysis of user interviews, identification of needs, prioritization of features, and creation of prototypes.

RIA role	Deployer	Personal data	Yes
AI processing type	Generative LLM · STT	Affected individuals	Customers participating in interviews
AI solution	Claude (Anthropic)		
Type of data processed	Communication data (verbatim notes, customer interview transcripts) · Internal text data (product briefs, backlog)		

7.12 Marketing strategy and content production

MARKETING TEAM · Minimal · BUILD

Creation of marketing content (articles, LinkedIn posts, web pages, visuals) driven by AI analysis of audience data (Matomo, LinkedIn Analytics). AI is used both in content production and in identifying the topics and formats to prioritize.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM	Affected individuals	Readers of our communications & visitors to our site
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (briefs, editorial guidelines) · Aggregated audience data (Matomo analytics, LinkedIn)		

7.12 Marketing strategy and content production

MARKETING TEAM · Minimal · BUILD

Creation of marketing content (articles, LinkedIn posts, web pages, visuals) driven by AI analysis of audience data (Matomo, LinkedIn Analytics). AI is used both in content production and in identifying the topics and formats to prioritize.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM	Affected individuals	Readers of our communications & visitors to our site
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (briefs, editorial guidelines) · Aggregated audience data (Matomo analytics, LinkedIn)		

7.13 Training and skill development

CROSS-FUNCTIONAL · Minimal · BUILD

Creation of training content (materials, exercises, courses) for employees and clients as part of training services.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM	Affected individuals	N/A
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (repositories, educational content)		

7.14 Application processing

HR TEAM · High · IDEA

AI-assisted application processing: CV analysis, scoring of alignment between profiles and job criteria.

RIA role	To be determined	Personal data	Yes
AI processing type	Generative LLM · Classification	Affected individuals	Candidates
AI solution	Specialized HR tool (to be determined) or Claude (Anthropic)		
Type of data processed	Identity data (name, contact information) · Professional data (resume, career history, skills) · Communication data (cover letters, interview notes)		

NOTE Digital4Better is exploring the use of AI to assist in the processing of applications, specifically by scoring the match between resumes and job descriptions. This use case falls under Annex III (4.a) of the EU AI Act, which classifies AI systems used for the recruitment or selection of persons as high-risk (Art. 6). Two approaches are examined: using a specialized third-party tool (ATS scoring) would place D4B as a deployer (Art. 26 obligations); configuring a general-purpose LLM such as Claude to perform scoring would reclassify D4B as a provider (Art. 25(1)), a far more demanding regime covering design, documentation, and compliance prior to deployment. If deployed internally, regardless of the tool, Digital4Better commits to informing candidates and maintaining human involvement in the processing of applications.

7.15 HR Management

HR TEAM · Minimal · DEPLOYED

AI support for HR processes: drafting job descriptions, preparing for interviews, and producing internal memos and summaries.

RIA role	Deployer	Personal data	Yes
AI processing type	Generative LLM	Affected individuals	Candidates & Employees
AI solution	Claude (Anthropic)		
Type of data processed	Internal text data (competency frameworks, existing job descriptions) · Communication data (notes and interview summaries)		

7.16 Reports — Customer Relations

CROSS-FUNCTIONAL · Minimal · BUILD

Automatic transcription and summary of meetings and calls with clients and prospects.

RIA role	Deployer	Personal data	Yes
AI processing type	STT · Generative LLM	Affected individuals	Clients & Employees
AI solution	Copilot (Microsoft) · Le Chat (Mistral) · Typeless		
Type of data processed	Audio data (meeting recordings) · Communication data (transcripts, summaries) · Professional business data (information discussed in meetings)		

7.17 Customer development and maintenance

SERVICES TEAM · Minimal · DEPLOYED

AI support for teams developing and maintaining software solutions for clients (code generation, testing, documentation, debugging).

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM · AI agents / orchestration	Affected individuals	Customers
AI solution	GitHub Copilot (GitHub/Microsoft) · Cursor (Cursor) · Claude Code (Anthropic) · Codex CLI (OpenAI)		
Type of data processed	Customer technical data		

7.18 AI embedded in the product (Accessibility module)

CUSTOMERS · Limited · DEPLOYED

AI features natively integrated into the Fruggr product to analyze the accessibility of digital services.

RIA role	Supplier	Personal data	No
AI processing type	Generative LLM · Classification	Affected individuals	Fruggr users
AI solution	Claude (Anthropic) · Le Chat (Mistral)		
Type of data processed	Technical data (performance metrics, digital service logs) · Customer data (visuals from the analyzed digital services)		

> **NOTE** In accordance with Article 50(1) of the EU AI Act, the presence of an AI system designed to interact directly with natural persons is clearly indicated to users of the Fruggr solution.

7.19 AI embedded in the product (AI Governance module)

CUSTOMERS · Minimal · BUILD

AI features natively integrated into the Fruggr product that enable a critical analysis of an AI charter.

RIA role	Supplier	Personal data	No
AI processing type	Generative LLM · RAG	Affected individuals	Fruggr users
AI solution	Claude (Anthropic) · Le Chat (Mistral)		
Type of data processed	Internal text data (D4B repository, regulatory texts) · Customer text data (submitted AI charter)		

7.20 AI assistance for everyday individual productivity tasks

CROSS-FUNCTIONAL · Minimal · DEPLOYED

Document correction and improvement, drafting and rewriting of internal communications, document summarization. Strictly internal use: any processing involving customer or confidential data falls under the corresponding business use cases.

RIA role	Deployer	Personal data	No
AI processing type	Generative LLM	Affected individuals	N/A
AI solution	Claude (Anthropic) · Le Chat (Mistral)		
Type of data processed	Internal text data · Communication data (drafts, internal emails)		

APPENDIX 02:

Our commitments to the responsible use of AI

01 **Human oversight**
Any deliverable created or modified by AI intended for a third party is subject to human review and validation before being sent.

02 **Data hosting**
Data hosting and processing within the European Union is prioritized and contractually agreed upon with suppliers.

03 **Up-to-date registry**
The registry is updated with every new AI system deployed and with every significant modification to an existing system.

04 **Preliminary analysis**
No AI application is put into production without a prior audit of the associated risks and regulatory implications.

05 **Employee training**
All employees receive training tailored to the risks specific to AI and best practices for responsible use.

06 **Stakeholder transparency**
D4B informs its clients and partners about the use of AI in the execution of its projects and the production of deliverables.

07 **Responsible marketing**
AI-assisted marketing content is limited to text and static visuals. AI-generated video is excluded.

08 **Digital frugality**
AI tools and models are selected in proportion to actual need. For equivalent needs, D4B prioritizes the most energy-efficient provider.

09 **Verification of supplier terms**
D4B verifies that the provider of an AI-integrated tool does not use the transmitted data to train its models and does not claim rights to the content produced.

10 **Control of the scope of use**
Any significant expansion of an existing AI use case is subject to a new analysis prior to implementation.