

BoardCue Live Customer Deployment DPIA Template

Last updated: 2 October 2026

Status: Template

Current cloud AI processing architecture

BoardCue sends authorised cloud AI requests directly to the Google Gemini Developer API (<https://generativelanguage.googleapis.com>) and OpenAI API (<https://api.openai.com>), using server-held credentials and server-selected models. No Lovable intermediary AI gateway is used in this processing path. The Google service is the Gemini Developer API, not Vertex AI.

Requests using /v1/chat/completions, including product analysis, summaries, minutes, questions, public/support chat and PDF OCR, may make at most 1 alternate-provider attempt when the alternate credential is configured. Failover is permitted for HTTP 401, 402, 403, 404, 429, errors marked retryable by the transport (including HTTP 500 and above, network/read errors, timeouts and unexpected native PDF response-normalisation errors), missing primary credentials or unreadable JSON responses. The original messages, retrieved context and attachments can therefore reach both providers during one logical request; model and provider-specific options are adapted. Input validation, size-limit failures and other non-retryable failures do not trigger failover. This does not guarantee that the alternate provider accepts every payload.

Embeddings do not fail over: product embeddings use Google's gemini-embedding-001 with 3,072 dimensions and response validation. Google PDF OCR sends inline PDF page data to the native generateContent endpoint; it does not upload to a Files API, but remains eligible for chat-path failover. Response parsing after the transport has returned does not itself trigger provider failover. Standard live speech recognition uses the browser/OS speech service, not this cloud AI transport. Local-browser AI is rejected by the server adapter and has no cloud fallback.

The repository establishes API routing, not the supplier account's contractual status. The applicable Google Gemini Developer API and OpenAI API account terms, billing/service tier, DPA and transfer safeguards, processing geography, content-use/training settings, logging and retention must be verified and recorded by the supplier-assurance owner. No zero-retention, UK-only or specific regional AI processing, Google Cloud enterprise controls, enhanced OpenAI retention terms or special contractual arrangement is asserted here.

Customer: [Organisation]

Deployment owner: [Name / role]

DPO/IG lead: [Name / role]

Assessment date: [Date]

Review date: [Date]

1. Intended use

Describe the governance purpose, boards/committees in scope and expected outcomes. Confirm whether the deployment follows the standard intended-use position:

- ☐ BoardCue is used for board/committee governance, not as a individual case record or case- management decision-support system.
- ☐ Routine individual case-management records or datasets are not required for normal use.
- ☐ Governance evidence about identifiable individuals will normally be aggregated, anonymised, summarised or otherwise appropriately governed where practical.
- ☐ Any identifiable individual service-user information that may appear incidentally in governance material is necessary, minimised and lawfully governed.

2. Features in scope

- ☐ Board/committee document storage
- ☐ Meeting preparation
- ☐ Live governance intelligence
- ☐ Browser/OS transcription
- ☐ Board Memory / Organisation Copilot / Search
- ☐ Actions and decisions
- ☐ Formal approvals/voting
- ☐ Briefings/workflows
- ☐ Inbound intelligence email
- ☐ Governance audit/export
- ☐ Other: ☐

3. Data subjects and categories

Identify the people likely to appear in the material. Distinguish routine governance participants from people who may only be referred to incidentally.

Board/committee members and executives

In scope?: ☐

Minimisation / reason: ☐

Employees/workers

In scope?: ☐

Minimisation / reason: ☐

Complainants/whistleblowers

In scope?: ☐

Minimisation / reason: ☐

Individuals referred to incidentally in governance material

In scope?: ☐

Minimisation / reason: ☐

Children/vulnerable people referred to incidentally

In scope?: ☐

Minimisation / reason: ☐

Other members of the public

In scope?: ☐

Minimisation / reason: ☐

4. Lawful basis and special-category conditions

Article 6 basis/bases: ☐

Article 9 condition where special-category information is processed: ☐

Criminal-offence condition where applicable: ☐

Sector-specific authority/policy: ☐

5. Transcription and endpoint decision

For managed browser/OS transcription, record the organisation's approved browser/device policy. The browser/OS provider may process speech under its own arrangements and is not automatically an ADEPTABLE subprocessor.

Approved browser/device environment: ☐

Meeting categories excluded from transcription: ☐

Participant notice process: ☐

6. AI processing decision

Which categories of governance content may be sent through BoardCue cloud AI? ☐

Which content must be excluded from AI processing? ☐

How will users verify source evidence against AI interpretation? ☐

7. Access and MFA

Organisation administrators: ☐

Committee-specific access: ☐

MFA required for all organisation users? ☐ Yes ☐ No

Joiner/mover/leaver and periodic access-review process: ☐

8. Retention, exit and deletion

Board papers

Customer retention rule: ☐

Reason: ☐

Minutes

Customer retention rule: ☐

Reason: ☐

Transcripts

Customer retention rule: ☐

Reason: ☐

AI outputs

Customer retention rule: ☐

Reason: ☐

Actions/decisions

Customer retention rule: ☐

Reason: ☐

Approvals/votes

Customer retention rule: ☐

Reason: ☐

Audit history

Customer retention rule: ☐

Reason: ☐

Will the Full Organisation Exit workflow form part of the order form? ☐ Yes ☐ No

If yes: confirm 14-day read-only export window, then active-system deletion, subject to verified deployment implementation. ☐

9. Supplier evidence reviewed

- ☐ Privacy Policy and DPA
- ☐ Master Product DPIA
- ☐ Subprocessor and Data Flow Register
- ☐ Security and IG Overview
- ☐ Retention Schedule
- ☐ Supabase production region and enterprise backup evidence
- ☐ direct Google Gemini Developer API and OpenAI API services assurance/transfer evidence
- ☐ Penetration-test/Cyber Essentials evidence where available
- ☐ Sector-specific assurance evidence where relevant to the customer's industry or regulatory environment

10. Decision

- ☐ Approved
- ☐ Approved subject to actions
- ☐ Pilot only
- ☐ Not approved
- ☐ ICO consultation required

Decision rationale: ☐

Outstanding actions / owners / dates: ☐