

NOTICE ON AUTOMATED SYSTEMS AND ARTIFICIAL INTELLIGENCE

1. Why we publish this notice

VERGO's analysis includes automated processing. We publish this notice for transparency and for compliance with Regulation (EU) 2024/1689 (the AI Regulation), as amended by Regulation (EU) 2026/1744. The Regulation applies uniformly across all Member States, and therefore also in relation to Users outside Romania.

2. What is automated

Component	Nature	Human intervention
Collection and overlay of data layers	deterministic algorithmic processing	no
Extraction of data from documents uploaded by the User	automated text and field recognition	no
Removal of personal identifiers from uploaded documents	automated anonymisation processing	no
Evaluation of criteria and score calculation	predefined rules, thresholds and weightings	no
Generation of the report structure	predefined templates	no
Drafting of narrative comments	deterministic algorithmic processing (predefined interpretations per criterion, from a catalogue of texts)	no
Analyses from the catalogue with human validation	professional interpretation	yes

2.1. The scoring component **is not an opaque machine-learning system**: it applies a set of rules and weightings established by VERGO, which are explainable in principle in the Methodological Note.

2.2. Extraction from documents. Automated text recognition may produce errors. Elements extracted from uploaded documents are **displayed to the User for verification** before the analysis is launched, whenever technically possible.

3. Classification under the AI Regulation

3.1. The analysis assesses the **characteristics of a plot of land**, not a natural person. It is not used for: biometric identification; management of critical infrastructure; education; employment; access to essential public or private services, including creditworthiness assessment; law enforcement; migration; administration of justice.

3.2. Consequently, in VERGO's assessment, the system **does not fall within the high-risk categories** set out in Annex III to the AI Regulation. This assessment is documented internally and is reviewed whenever the functionality undergoes a substantial modification.

3.3. VERGO complies with the applicable transparency obligations, including labelling artificially generated content where applicable, and informing the User when interacting with an automated system.

3.4. VERGO ensures an adequate level of AI literacy for staff involved in operating and developing the system.

4. Limitations of the automated components

4.1. Automated processing reproduces the errors and gaps present in the data sources and in the documents provided. It does not correct, independently verify, or fill in missing data.

4.2. The system does not "understand" the legal or economic context of a site; it applies rules to data.

4.3. The result is **indicative** in nature. Full limitations are set out in the Methodological Note.

5. Human intervention and contesting a result

5.1. Although the AI Regulation does not, in this case, require a mechanism for contesting results, VERGO makes one available voluntarily.

5.2. If you consider that a result is incorrect, send a notice to office@vergo.ro, with the report identifier and the element being contested, in Romanian or English. A human operator reviews it within **5 business days** at the latest. If a processing error is confirmed, the report is regenerated free of charge, in accordance with Section B of the Return and Refund Policy.

6. What we do not do

- We do not use your data to train models intended for third parties.
- We do not carry out profiling of users.
- We do not make automated decisions that produce legal effects on natural persons.