



RUNNING EXAMPLE

Rhena logs the decisions of its agent "ANNA" (level 1 home claims). Maintained by Dr Katrin Ostermann (DDAO , Delegated Decision Agent Officer), supervised together with Ines Baumgartner (Customer Service).

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1 DECISIONS & INCIDENTS REGISTER

DATE / TIME	AGENT	DECISION / EVENT	RISK	VALIDATED BY	OUTCOME / IMPACT	FOLLOW-UP
03/11 08:20	ANNA	Settlement €1,920 · escape of water, 4-year-old contents	● Moderate	Auto (supervised)	Settled, policyholder notified < 4h	Log · weekly review
03/11 11:47	ANNA	Claim estimated €3,400 · above the €2,500 cap	● High	Co-decision I. Baumgartner	Escalated, adjuster appointed	24-hour review (mandate ACF-13)
03/11 14:05	ANNA	Complaint about the depreciation rate applied	● Moderate	Co-decision I. Baumgartner	3 further complaints within 20 min	Immediate analysis
03/11 14:22	ANNA	Depreciation schedule still on the 2026 grid	● Critical	Auto → alert K. Ostermann (DDAO)	Stop: Europe 3 min, subsidiary 43 min	Post- mortem ACF-10
03/15 09:00	ANNA	Restart at 5% after the schedule fix	● High	K. Ostermann (DDAO)	Restart OK, 430 files put right	24-hour review
03/15 16:05	ANNA	Policyholder threatening to go to the Ombudsmann	● High	Co-decision I. Baumgartner	Out of scope → handled by a human handler	Closed D+1

● Critical = immediate halt ● High = 24-hour review ● Moderate = weekly review ● Low = log only
● Very low = sampling



2 NOTES & CONTEXT

Incident #4 (03/11). The 1 March tariff revision was not carried into the depreciation schedule : the contents rate stayed at 12% instead of 10%. Fix: schedule corrected, version logged on every decision. 430 policyholders paid the balance, €77,400. Full post-mortem → **ACF-10**.

Mandate compliance. All settlements > €2,500 this week were escalated in line with the mandate (**ACF-13**). No refusal of cover pronounced autonomously, without co-decision.

Indicators. Weekly policyholder satisfaction: 4.1 / 5. Level 1 settlement rate without human intervention: 54%.

3 REGISTER GOVERNANCE RULES

WHY KEEP THIS REGISTER?

- AI Act requirement (art. 12 · logging) & DORA
- Evidence of governance for fiduciary audit
- No trail, no accountability

CONFIDENTIALITY

- ! Contains sensitive data (customers, amounts)
- ! Restricted access: DDAO, DPO, executive management
- ! Retention & purge per GDPR policy

REVIEW FREQUENCY

- ✓ Critical / High: review within 24 hours
- ✓ Moderate: weekly review
- ✓ Monthly overall review (DDAO + DPO)

Next step: turn tracked incidents into an improvement plan with **ACF-10**, trigger **ACF-07 · Kill Switch** if a threshold is crossed, and tie each decision back to the **ACF-13 mandate**.