V1.0

Privacy Impact Assessment

Claude Opus 4.7

A principles-based assessment under GDPR, the EU AI Act, and the AI Governance Stack framework

This publication is available free of charge

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Executive Summary

Claude Opus 4.7 is Anthropic, PBC's flagship large language model, released in April, 2026, and positioned as the company's top-tier system for complex reasoning, agentic workflows, and extended-context coding tasks. The model is accessible through the Claude.ai consumer web and mobile applications, the Claude developer API, Amazon Bedrock, Google Cloud Vertex AI, and Microsoft Foundry on Azure. It processes text and vision inputs, supports a context window of up to one million tokens in beta, and introduces a multi-agent architecture in which multiple instances of the model can coordinate peer-to-peer through a "mailbox protocol."

This Privacy Impact Assessment (PIA) was conducted to evaluate the privacy risks, regulatory exposure, and data governance posture associated with Claude Opus 4.7 across its primary consumer and enterprise surfaces. The analysis applies the PIA methodology developed by Digital 520, triangulated with the AI Governance Stack framework presented in Governing Intelligence (Kenney, 2026).

Key findings:

- Data minimization at account creation is materially stronger than legacy comparators. Users may register with only an email address (or SSO token) and are not required to provide date of birth, first and last name, or phone number to access free or Pro tiers of Claude.ai as of April 2026.
- Anthropic has shifted to an opt-in model for training on consumer conversations. Users who decline have a 30-day back-end retention window; users who opt in have their de-identified data retained for up to five years. This represents a defensible lawfulness posture under both the GDPR and CCPA/CPRA, but creates a meaningful information-asymmetry risk if the opt-in disclosure is not sufficiently clear.
- Opus 4.7 demonstrates industry-leading robustness to prompt injection and safeguard bypass attempts, as validated by Gray Swan adversarial evaluations cited in Anthropic's system card. Most injection vectors that successfully compromised earlier-generation systems are neutralized by Opus 4.7's alignment training.
- Vision capabilities permit inference of geographic location, approximate age range, and other sensitive attributes from user-supplied images. This is a material privacy concern identical in nature to that documented in the author's 2023 ChatGPT 4.0 PIA; it has not been addressed industry-wide.
- Anthropic's Usage Policy prohibits Claude use by anyone under 18 — stricter than the OpenAI policy benchmarked in 2023 — but enforcement relies on self-attestation at account creation, with no identity-document verification. This creates an age-assurance gap under KOSPA, COPPA, and the EU AI Act's minors-protection provisions.
- Cross-border data transfers from the European Economic Area, United Kingdom, and Switzerland are executed under Standard Contractual Clauses and a publicly documented subprocessor list. Adequacy decisions and the EU–U.S. Data Privacy Framework provide additional lawful bases. The overall transfer posture is acceptable but should be monitored as the Schrems II landscape evolves.

- Under the EU AI Act, Claude Opus 4.7 is almost certainly a general-purpose AI model with systemic risk given its training compute and downstream reach. This triggers Chapter V obligations including model evaluations, adversarial testing, systemic-risk assessment, and incident reporting — obligations for which Anthropic already provides significant public evidence of compliance via its system card and Responsible Scaling Policy.

Residual Risk Posture:

After accounting for Anthropic's existing technical and organizational controls, residual risk is assessed as Moderate for consumer deployments and Low-to-Moderate for enterprise deployments operating under Zero Data Retention contractual terms. The most significant unmitigated risks concern (1) age-assurance gaps for users claiming to be adults, (2) vision-based inference of sensitive attributes, (3) transparency gaps around what specifically is done with "flagged" conversations retained for up to two years, and (4) the opacity of de-identification techniques applied prior to model training.

This assessment concludes that Claude Opus 4.7 can be deployed and used within acceptable privacy-risk bounds provided that the deployer implements the recommendations in Section 9.2 (Action Plan). The model meaningfully exceeds the privacy and safety posture of comparable frontier systems assessed by this author in prior work, while retaining several categories of risk that are endemic to the large-language-model class as a whole.

Background Information

1. System Summary

Claude Opus 4.7 is a multimodal transformer-based large language model developed and operated by Anthropic, PBC, a Public Benefit Corporation headquartered in San Francisco, California. The model is the flagship offering in the "Opus" tier of Anthropic's three-tier product family (Opus for complex work, Sonnet for everyday tasks, and Haiku for speed and high-volume inference). Opus 4.7 was released to general availability as the current default Opus model as of the date of this assessment.

Functionally, Claude Opus 4.7 accepts inputs in natural-language text and in images (vision modality) and produces outputs in natural-language text. The model does not produce native audio, video, or image outputs; image-generation requests are routed to external tools where those integrations exist. Voice input on Claude.ai is implemented via client-side speech-to-text rather than direct audio ingestion into the model. The model supports a context window of two hundred thousand tokens in general availability and one million tokens in beta, as well as a multi-agent architecture in which peer instances of the model can exchange messages via a mailbox protocol.

Claude Opus 4.7 is accessible through the following primary surfaces: the Claude.ai consumer web and mobile applications (on Free, Pro, and Max tiers); Claude for Work, Claude for Government, and Claude for Education (collectively, "enterprise" offerings); the Anthropic developer API; the Claude Code command-line tool for software engineering workflows; Claude in Chrome (a browsing-agent research preview); Cowork mode (a desktop agent research preview); and third-party integrations via Amazon Bedrock, Google Cloud Vertex AI, and Microsoft Foundry on Azure. Different surfaces are governed by different Anthropic product policies and, in the case of cloud re-sellers, by additional agreements with those cloud providers.

2. Scope of PIA

This Privacy Impact Assessment covers the Claude Opus 4.7 model and its deployment on Anthropic-operated consumer and enterprise surfaces (Claude.ai, the Anthropic API, Claude Code, Claude in Chrome, and Cowork). It does not cover deployments where Opus 4.7 is embedded as a subcomponent of a third-party application, because those deployments are governed by the third party's controller-level data-protection posture rather than by Anthropic alone. Where Opus 4.7 is accessed via Amazon Bedrock, Google Cloud Vertex AI, or Microsoft Foundry, this assessment treats Anthropic as the model provider and the respective cloud vendor as an independent controller for billing, infrastructure, and cloud-level telemetry.

The assessment is conducted from a United States vantage point but is drafted with particular attention to the General Data Protection Regulation (GDPR) and the EU AI Act, because (a) the GDPR establishes the global high-water mark for comprehensive data-protection law and (b) the EU AI Act imposes enforceable, class-level obligations on general-purpose AI models such as Opus 4.7 regardless of where the model is trained or physically hosted. State-level U.S. privacy laws (CCPA/CPRA, Virginia CDPA, Colorado CPA, Connecticut CTDPA, Texas TDPSA, and others),

sector-specific laws (HIPAA, GLBA, FERPA, COPPA), and the Kids' Online Safety and Privacy Act (KOSPA) are addressed in the Sectoral and Local Compliance section.

The following are explicitly out of scope: (1) the security of Anthropic's underlying cloud infrastructure beyond what is publicly documented; (2) the contents of any non-public Anthropic internal policies or confidential audit reports; (3) privacy-preserving research techniques used in model training, where those techniques are not publicly documented; (4) the behavior of Claude models other than Opus 4.7 (although where Anthropic policies apply uniformly across models, this is noted); and (5) risks arising from user conduct that violates Anthropic's Usage Policy.

3. Methodology

This PIA applies the Digital 520 Privacy Impact Assessment framework, a successor methodology to the one used in the author's publicly released 2023 ChatGPT 4.0 PIA. The framework is aligned with the comprehensive PIA structure described in §11.5 of Governing Intelligence (Kenney, 2026) and incorporates the AI Governance Stack as an organizing lens for risk identification and control mapping.

The assessment drew on the following sources:

1. Anthropic's publicly released Claude Opus 4.7 System Card, Usage Policy, Consumer Terms of Service, Privacy Policy, Subprocessor List, and Trust Center disclosures, each accessed as of April 2026.
2. Anthropic's Responsible Scaling Policy (RSP) and the associated "AI Safety Level" (ASL) evaluation regime, under which Opus 4.7 was released at the ASL-3 Standard.
3. Secondary research sources including independent benchmarks (Gray Swan adversarial evaluations, SWE-bench Verified, Aider Polyglot) and published academic and industry analyses of large language model privacy risks.
4. The AI Governance Stack specification described in Chapter 2 of Governing Intelligence, which provides the five-layer framework (Data Governance; Model Governance; System Integration Governance; Control and Monitoring Governance; Audit and Evidence Governance) used for risk and control mapping in this document.

It is important to state the limitations of this research. As with the author's 2023 ChatGPT 4.0 PIA, this assessment was conducted without any insider knowledge of Anthropic and without access to any restricted, pre-release, or internal version of Claude Opus 4.7. All findings are derived from publicly available information and from behavioral observation of the production model. Anthropic's actual internal controls may exceed what is publicly disclosed; where this is plausible, the assessment notes it. The assessment does not substitute for a Data Protection Impact Assessment (DPIA) conducted by an organization deploying Opus 4.7 within its own environment, which must be tailored to that organization's specific processing operations, data subjects, and risk appetite.

4. Regulatory Context and Applicability

Claude Opus 4.7 is subject to overlapping privacy and AI-specific regulatory regimes. The following table summarizes the key regimes and their applicability to the model and its deployments.

Regulation	Applicability to Claude Opus 4.7	Primary Obligations Triggered
EU GDPR (Regulation 2016/679)	Applies when personal data of EU/EEA/UK data subjects is processed, regardless of where Anthropic is established.	Lawful basis, data subject rights, DPIAs for high-risk processing, cross-border transfer mechanisms, breach notification.
EU AI Act (Regulation 2024/1689)	Claude Opus 4.7 qualifies as a general-purpose AI model (GPAI) and, given training compute above 10^25 FLOPs thresholds, almost certainly as GPAI with systemic risk.	Model evaluations, adversarial testing, systemic-risk assessment, serious-incident reporting, technical documentation, copyright policy.
California CCPA/CPRA	Applies to California residents' personal information processed by Anthropic, which meets the CCPA business threshold.	Notice at collection, right to know/delete/correct/opt-out of sale, sensitive personal information limitations.
Virginia CDPA, Colorado CPA, Connecticut CTDPA, Texas TDPSA, and other state privacy laws	Applies to processing of residents of those states when Anthropic meets threshold tests.	Similar core rights to CCPA; varying rules on sensitive data consent, profiling, and data protection assessments.
COPPA (15 U.S.C. §§ 6501–6506)	Anthropic prohibits users under 13 categorically; consumer terms require users to be 18+. Applies if children under 13 access the service without authorization.	Verifiable parental consent; prohibition on behavioral advertising to children; data minimization for children.
KOSPA / KOSA (if enacted in current form)	Would apply to covered platforms with minor users; age-assurance and design-safety obligations.	Duty of care, age-appropriate design, disclosures, minimization of addictive design features.
HIPAA	Does not directly regulate Anthropic; applies to covered entities and business associates using Claude to process PHI. Anthropic offers a BAA for certain enterprise customers.	BAA execution, administrative/physical/technical safeguards, breach notification under the HITECH Act.
GLBA	Applies to financial institutions using Claude to process non-public personal information.	Safeguards Rule, privacy notices, limits on disclosure to third parties.

FERPA	Applies to educational institutions using Claude for Education on student education records.	Parental/eligible-student consent; limits on redisclosure; recordkeeping obligations.
UK GDPR and UK Data Protection Act 2018	Applies to UK data subjects; substantively aligned with EU GDPR post-Brexit.	Effectively mirrors EU GDPR; International Data Transfer Agreement or UK Addendum required for transfers.
Brazil LGPD	Applies to Brazilian data subjects; Anthropic relies on ANPD-approved SCCs.	Similar principles to GDPR with ANPD-specific enforcement.

Table 1. Principal regulatory regimes applicable to Claude Opus 4.7.

Several additional regimes may apply to specific deployment contexts but are not analyzed in depth here: the New York SHIELD Act, biometric-specific laws such as Illinois BIPA (relevant where vision inputs may be construed as biometric identifiers), Washington My Health My Data Act (relevant for health-related queries), and sectoral AI rules being developed by the Federal Trade Commission, the Consumer Financial Protection Bureau, and state insurance regulators. Deployers are responsible for identifying and complying with the full set of regulations applicable to their specific use case.

5. Roles and Responsibilities

Determining the allocation of controller and processor roles under GDPR is critical to defensible AI governance. The following table reflects the author's best assessment of roles across the primary Claude Opus 4.7 deployment patterns. Organizations must independently validate this allocation for their specific processing activities.

Processing Activity	Controller	Processor / Sub-processor
Claude.ai Free / Pro / Max consumer use	Anthropic (as to account data, analytics, training data where opted in)	Anthropic's cloud hosts and subprocessors
Claude for Work / Government / Education	Customer organization (as to end-user content)	Anthropic as processor; underlying cloud as sub-processor
Direct Anthropic API (first-party integration)	Customer organization	Anthropic as processor
Claude via AWS Bedrock / GCP Vertex AI / Azure Foundry	Customer organization	Cloud vendor as processor with contractual relationship to Anthropic
Model training on consumer data (opt-in)	Anthropic	Cloud hosts, labeling vendors, safety-review vendors

Trust and Safety review of flagged content	Anthropic	Internal reviewers and safety-review subprocessors

Table 2. Controller and processor role allocation across primary deployment patterns.

Anthropic designates a Data Protection Officer and an EU/UK representative under Article 27 GDPR; privacy-related requests are routed through privacy@anthropic.com. Organizations deploying Claude should identify an internal privacy lead, a system owner, an AI governance lead, and an incident-response owner, and should document escalation paths into Anthropic's security and privacy functions.

Data Sources and Flow

1. Information and Data Collected

The following table enumerates categories of personal data that Claude Opus 4.7 deployments may process, informed by the Digital 520 comprehensive data inventory schema. The "Collected" column reflects whether the category is processed on at least one Anthropic-operated Claude surface in the normal course of operation; it does not reflect what any individual user chooses to submit in conversation.

Category	Data Element	Collected?	Notes
Identity and demographic	First name	Optional	Not required for account creation; users may volunteer in-conversation.
	Middle name	No	Not collected by Anthropic in account metadata.
	Last name	Optional	Not required for account creation.
	Preferred name / alias	Yes	Users may set display name in Claude.ai profile.
	Username / display name	Yes	Derived from email or explicitly set by user.
	Maiden name / former name	No	Not collected in structured form.
	Date of birth (full)	No	Not collected at account creation as of April 2026.
	Month of birth	No	Not collected.
	Year of birth	No	Not collected.
	Age (explicit)	Self-attested only	User attests to being 18+ at signup; no collection of numeric age.
	Age range	Inferred	May be inferred from vision input of user's image.
	Gender	No	Not collected in structured form.
	Gender identity	No	Not collected in structured form.
	Sex assigned at birth	No	Not collected.
	Race	Inferred	May be inferred from vision or text input.

	Ethnicity	Inferred	May be inferred from vision or text input.
	Nationality	Inferred	May be inferred from IP geolocation or in-conversation context.
	Citizenship	No	Not collected in structured form.
	Language preference	Yes	Derived from browser locale and in-conversation behavior.
Contact data	Personal email address	Yes	Required for account creation on Claude.ai.
	Work email address	Optional	Used for Claude for Work enrollment.
	Mobile phone number	No	Not required for Claude.ai account creation as of April 2026.
	Home phone number	No	Not collected.
	Work phone number	No	Not collected.
	Mailing address (street)	Optional	Collected only for paid subscriptions where billing requires it.
	Apartment or unit number	Optional	Same as above.
	City	Derived	May be inferred from IP; collected for billing.
	State / province	Derived / collected for billing	Relevant for tax calculation.
	ZIP / postal code	Derived / collected for billing	Relevant for tax calculation.
	Country	Derived / collected for billing	Available countries restricted to Anthropic's supported list (195 countries).
	Billing address	Required (paid plans)	Collected by payment processor on Anthropic's behalf.
	Shipping address	No	Not applicable (no physical product).
Government identifiers	Social Security Number	No	Not collected.
	Partial SSN (last 4)	No	Not collected.

	National ID number	No	Not collected.
	Passport number	No	Not collected.
	Driver's license number	No	Not collected.
	State ID number	No	Not collected.
	Taxpayer Identification Number	No	Not collected from consumer users.
	Voter registration number	No	Not collected.
Financial data	Credit or debit card number	Via processor	Processed by Stripe or equivalent; not stored by Anthropic directly.
	Card expiration date	Via processor	Processed by Stripe or equivalent.
	Card CVV / CVC	No (not retained)	CVV is not retained after authorization.
	Bank account number	No	Not collected on consumer surfaces.
	Routing number	No	Not collected on consumer surfaces.
	IBAN / SWIFT	No	Not collected on consumer surfaces.
	Payment token (e.g., Stripe token)	Yes	Token is retained for recurring billing.
	Transaction history	Yes	Subscription and billing history retained.
	Billing history	Yes	Retained for tax and accounting purposes.
	Credit score	No	Not collected.
	Income level	No	Not collected in structured form.
	Employment compensation	No	Not collected.
Authentication data	MFA phone number	Optional	Collected only if user enables SMS-based MFA.
	MFA email	Yes	Account email also serves as recovery channel.
	Biometric authentication data	Optional	May be processed client-side for Face ID / Touch ID; not transmitted to Anthropic.

Device and network	IP address	Yes	Collected automatically; used for fraud, localization, analytics.
	MAC address	No	Not collected.
	Device ID	Yes	Mobile advertising identifier may be received via SDKs; opt-outs respected.
	Advertising ID (IDFA, GAID)	Limited	Not used for cross-contextual behavioral advertising.
	Cookie identifiers	Yes	First-party cookies used for session management; third-party analytics cookies present.
	Browser fingerprint	Partially	User agent and basic device characteristics captured; aggressive fingerprinting not documented.
	User agent string	Yes	Collected in standard logs.
	Device type / OS	Yes	Collected for performance and localization.
	Screen resolution	Yes	Collected client-side for responsive UI.
	Time zone	Yes	Derived from browser or device.
Location data	Country (derived)	Yes	Derived from IP.
	City (derived)	Yes	Derived from IP.
	ZIP / postal code (derived)	For billing only	Derived for tax jurisdiction.
	GPS location (precise)	No	Not requested by Anthropic surfaces.
	GPS location (approximate)	No	Not requested.
Employment and education	Employer name	No	Not collected by Anthropic; user may volunteer.
	Job title	No	User may volunteer in-conversation.
	Employment status	No	Not collected.
	Work history	No	Not collected in structured form.
	Resume / CV	In-conversation	User may paste or upload.
	Education level	No	Not collected.
	School / university	No	Not collected.

	Student ID number	Via Claude for Education	Only where institution enrolls users with ID.
Health and sensitive	Medical conditions	In-conversation only	User may volunteer; Anthropic does not solicit.
	Disability status	In-conversation only	Same as above.
	Health insurance information	No	Not collected.
	Genetic data	No	Not collected.
	Fingerprints	No	Not collected.
	Facial recognition data	No (not retained)	Vision model may process face images transiently but does not perform persistent biometric identification.
	Voiceprints	No	Voice is transcribed client-side; raw audio is not retained by the model.
	Heart rate / fitness data	No	Not collected.
	Mental health information	In-conversation only	User may volunteer; raises sensitive-data concerns.
Usage and behavioral	Account activity logs	Yes	Login, API calls, and administrative events.
	Login timestamps	Yes	Collected for security and fraud prevention.
	Feature usage analytics	Yes	Which features accessed, frequency, session length.
	Search queries (within Claude.ai)	Yes	History search, saved prompts.
	Content interactions	Yes	Thumbs up/down, copy events, regenerate clicks.
	Messages or comments	Yes	All conversation inputs and outputs retained per retention policy.
	Uploaded files	Yes	PDFs, documents, images uploaded into conversations.
	User-generated content	Yes	Projects, Artifacts, and stored prompts.

	Emails / messages sent through platform	Via Projects	Limited; subject to connector configurations.
	Emails / messages received through platform	Via Projects	Same as above.
	Support tickets	Yes	Collected when user contacts support.
	Call recordings	No	Not applicable.
	Voicemails	No	Not applicable.
	SMS / MMS messages	No	Not applicable.
	Social media handles	In-conversation only	User may volunteer.
	Linked social accounts	Optional	Only if user links Google, Apple, or similar SSO.
	Contacts / address book	No	Not accessed.
	Friends / followers	No	Not applicable.
Consent and preferences	Legal consent records	Yes	Terms acceptance timestamp, training opt-in state.
	Privacy preferences	Yes	Including data-training preference.
	Marketing opt-in status	Yes	Stored as separate preference.
	Age-verification status	Self-attested	18+ checkbox only; no ID verification.
	Identity verification results	No	Not required on Claude.ai.
	Background check results	No	Not collected.
	Record of criminal history	No	Not collected.
Inferred data	Behavioral predictions	Limited	Used internally for safety classification; not used for advertising.
	Creditworthiness (derived)	No	Not inferred.
	Inferred interests or preferences	Limited	Session-level personalization may occur.
	Advertising segments	No	Anthropic does not sell advertising and does not build segments.

Table 3. Comprehensive inventory of personal data categories against Claude Opus 4.7.

Several observations are warranted. First, account-creation data collection is materially leaner than the posture documented in the author's 2023 ChatGPT 4.0 PIA, where OpenAI required email, password, date of birth, first name, last name, and phone verification. As of April 2026, Anthropic requires only an email address (or a third-party SSO token) to create a Claude.ai account. This represents a defensible stance on GDPR Article 5(1)(c) data minimization. Second, sensitive categories such as medical conditions, mental health information, and political beliefs are not solicited by Anthropic's surfaces but are frequently volunteered by users in conversation, creating a lawfulness challenge that is addressed in §4.2 of this assessment. Third, payment information is handled through a processor (Stripe) in a manner that substantially reduces Anthropic's direct exposure to cardholder data under PCI DSS.

2. Sources of Data Collection

Claude Opus 4.7 ingests data through the following channels:

1. Direct user input through Claude.ai, the Anthropic API, Claude Code, and other Anthropic surfaces. This includes text prompts, uploaded images (including PDFs rendered as images), uploaded documents, code, and project materials.
2. Automated collection at account creation and at each session, including the user's email address, SSO token, IP address, device characteristics, user-agent string, and timestamp metadata.
3. Passive collection through server logs, application telemetry, and cookies, which capture feature usage, session length, error states, and interaction events such as regenerate requests and feedback ratings.
4. Third-party data received from SSO providers (e.g., Google, Apple, Microsoft) pursuant to user consent at sign-in, comprising an email address and in some cases a display name.
5. Tool-use and connector-mediated data, where the user or deployer has configured Claude to access external systems such as Gmail, Google Drive, Slack, Notion, or databases. In these cases, data flows from the connected system through Claude subject to the scopes granted by the user.
6. Web content retrieved by Claude's web-fetch capability, where Claude is authorized to retrieve a specified URL. Content retrieved this way is processed for the user's request and subject to Anthropic's data-handling practices.
7. Publicly available information on the Internet and licensed datasets used for model training and evaluation. These training data sources are explicitly out of scope for per-user PIA analysis but are relevant to the model's aggregate risk profile under the EU AI Act.
8. De-identified consumer conversations and coding sessions, where the user has opted in to training data use. As of the Anthropic consumer-terms update in effect as of October 2025, training on new or resumed conversations occurs only when the user affirmatively enables this setting.

3. Categories and Locations of Data Subjects

Data subjects interacting with Claude Opus 4.7 are categorized as follows: (1) adult consumer users of Claude.ai and Claude mobile applications; (2) developers and enterprise administrators accessing the Anthropic API and Claude Code; (3) end-users of enterprise customers operating under Claude for Work, Claude for Government, and Claude for Education; (4) third parties whose information is incidentally processed when a user submits content that mentions them ("non-user data subjects"); and (5) data subjects whose personal information is reflected in training data originating from public or licensed sources.

Anthropic's consumer offerings are available in 195 countries and territories, with specific Ukrainian regions (Crimea, Donetsk, Kherson, Luhansk, and Zaporizhzhia) excluded. Enterprise and cloud-mediated deployments are available more broadly, subject to local legal restrictions. Data subjects are therefore globally distributed, with particularly dense populations in the United States, Western Europe, the United Kingdom, Canada, Australia, Japan, India, and Brazil.

Two vulnerable-population risks are highlighted. First, although Anthropic's Usage Policy prohibits users under 18 from creating Claude.ai accounts, age-assurance mechanisms are limited to self-attestation, and documentary review indicates residual exposure for users claiming to be minors. Second, Claude for Education may involve university students, who are adults, but may also extend to younger populations in specific institutional programs, triggering heightened obligations under FERPA, COPPA, and potentially KOSPA.

4. Purposes of Processing and Legal Bases

Under GDPR Article 6, every processing activity must have a defensible legal basis. The following mapping is the author's analysis of Anthropic's likely Article 6 posture for each primary processing purpose. Deployers using Claude as a processor must select Article 6 bases appropriate to their own processing.

Processing Purpose	Primary Legal Basis (GDPR Art. 6)	Notes
Service delivery — responding to user inputs	6(1)(b) Contract performance	Processing is necessary to deliver the service the user requested.
Account creation and authentication	6(1)(b) Contract; 6(1)(f) Legitimate interest	Fraud prevention and account security rely on legitimate interest.
Billing and financial reporting	6(1)(b) Contract; 6(1)(c) Legal obligation	Tax and financial recordkeeping obligations apply.

Training on consumer conversations (opt-in)	6(1)(a) Consent	Consent must be freely given, specific, informed, unambiguous, and revocable.
Training on public or licensed datasets	6(1)(f) Legitimate interest (or consent where obtained by the original publisher)	Requires balancing test documentation and transparency disclosures.
Safety, Trust & Safety review, abuse detection	6(1)(f) Legitimate interest; 6(1)(c) Legal obligation where applicable	Retention up to 2 years for confirmed policy violations; 7 years for safety-score data.
Product analytics and feature development	6(1)(f) Legitimate interest	Requires documented balancing test; must allow objection under Art. 21.
Marketing communications	6(1)(a) Consent	Opt-in required in EU/EEA; opt-out acceptable in some jurisdictions.
Sensitive categories under Art. 9 (health, biometric, etc.) volunteered in-conversation	9(2)(a) Explicit consent — but see caveat	Consent is difficult to establish for volunteered data; deployers should discourage or filter such inputs.
Vision-based inference that may reveal sensitive attributes	No defensible Art. 9 basis for systematic inference	This is a major latent risk; see §8.3.

Table 4. Processing purposes mapped to likely GDPR Article 6 legal bases.

Legitimate-interest bases require a documented balancing test under GDPR Article 6(1)(f) weighing Anthropic's interests against the rights and freedoms of data subjects. Anthropic's privacy policy references legitimate interest as a basis but does not publicly disclose the balancing-test analysis. For high-assurance deployments, customers should consider executing a Data Processing Addendum that clearly allocates controller-level obligations, and should document their own balancing tests where they act as controllers.

5. Sharing and Sale of Data

Anthropic's Privacy Policy states that personal data is not sold and is not shared for cross-contextual behavioral advertising. This is a stronger position than many peer services and has explicit alignment with the CCPA/CPRA opt-out framework. Disclosure of personal data occurs to the following categories of recipients: affiliates and related entities of Anthropic; service providers and subprocessors (cloud hosts, payment processors, analytics providers, safety-review vendors, customer-support platforms); governmental regulatory authorities where legally compelled; and third parties in connection with corporate transactions or litigation.

A formal subprocessor list is published and updated. Material subprocessors include Amazon Web Services and Google Cloud (model hosting and infrastructure), Stripe (payment processing),

Segment or equivalent (product analytics), Cloudflare (edge security and delivery), customer-support platforms such as Intercom, and human-review vendors for Trust and Safety. Deployers should consult Anthropic's live subprocessor list at the time of deployment and monitor for changes, as the GDPR requires notification and a right of objection to new subprocessors.

Unlike the 2023 OpenAI privacy policy analyzed in the author's ChatGPT 4.0 PIA, Anthropic's privacy policy provides a reasonably clear definition of personal data tracking the GDPR definition. Residual ambiguity remains around de-identified and aggregated data: the policy permits extended retention and broader use of data once it has been de-identified, but does not specify the de-identification technique, the re-identification risk assessment methodology, or ongoing monitoring for re-identification attacks. This is flagged in §8.4 of this assessment.

6. Cross-Border Data Transfers

Personal data is transferred from the European Economic Area, the United Kingdom, and Switzerland to Anthropic infrastructure in the United States, and from those regions to Anthropic's cloud hosts in multiple regions. Anthropic discloses reliance on the following transfer mechanisms under GDPR Chapter V:

- Adequacy decisions of the European Commission for transfers to countries that have been granted adequacy (e.g., the United Kingdom, Canada in limited scope, Japan, South Korea).
- Standard Contractual Clauses (SCCs) approved under Commission Implementing Decision 2021/914 for transfers to third countries lacking adequacy, supplemented by transfer-impact assessments where appropriate.
- The EU–U.S. Data Privacy Framework for transfers to U.S.-established Anthropic entities certified under the Framework.
- The UK International Data Transfer Agreement (or the UK Addendum to the EU SCCs) for transfers from the United Kingdom.
- ANPD-approved Standard Contractual Clauses for transfers from Brazil under the LGPD.

As of April 2026, the Schrems II landscape remains unsettled, with further legal challenges to the EU–U.S. Data Privacy Framework anticipated. Enterprise customers with elevated transfer-risk appetite may wish to negotiate EU-region data residency, which Anthropic offers for certain enterprise tiers via AWS Bedrock and GCP Vertex AI.

7. Data Retention and Deletion

Anthropic's retention posture differs meaningfully across data categories and across the user's training-opt-in state. The following table summarizes retention periods as disclosed in Anthropic's privacy documentation as of April 2026.

Data Category	Retention Period	Basis

Deleted conversations (user-initiated deletion)	Removed from interface immediately; purged from back-end within 30 days.	Backup reconciliation window.
Conversations where user has NOT opted in to training	Retained for 30 days unless flagged or subject to legal hold.	Standard privacy posture under current Anthropic policy.
Conversations where user HAS opted in to training	De-identified data retained up to 5 years in training pipelines.	Model improvement; subject to the opt-in and de-identification disclosures.
Conversations flagged for policy violation	Up to 2 years.	Safety review, abuse detection, legal compliance.
Safety classification scores	Up to 7 years.	Trust & Safety pattern analysis.
Feedback submissions (thumbs, bug reports)	Up to 5 years.	Product improvement and quality assurance.
Account data (email, billing)	Duration of account plus retention tail for legal obligations.	Account management, tax, fraud prevention.
Incognito chats (Claude.ai feature)	Not used for training regardless of settings; retained only for session state.	Privacy-preserving default for ephemeral use.

Table 5. Data retention schedule for Claude Opus 4.7 consumer deployments.

Deletion is generally operationalized through user-initiated requests in the product interface, augmented by email requests to privacy@anthropic.com for data not reachable through in-app controls. For enterprise customers, retention can be customized contractually and Anthropic offers Zero Data Retention (ZDR) for API customers who require it. The retention posture is defensible under GDPR Article 5(1)(e) storage limitation, subject to the caveat that the 7-year safety-score retention is longer than most comparable services and should be supported by a documented proportionality analysis.

8. Data Security and Storage

Anthropic publicly represents that it implements appropriate technical and organizational measures to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Specific measures referenced across Anthropic's Trust Center, Privacy Policy, and enterprise documentation include the following:

- Encryption in transit using TLS 1.2 or higher for all API and web traffic.
- Encryption at rest for stored personal data, using provider-managed or customer-managed keys on major cloud platforms.
- Role-based access controls, least-privilege policies, and auditable access logs for personnel access to production systems.
- Tenant isolation for enterprise deployments, with logical separation of customer data.

- SOC 2 Type II certification and ISO 27001 alignment (as disclosed on Anthropic's Trust Center via Vanta).
- HIPAA Business Associate Agreements offered to qualifying enterprise healthcare customers.
- A Responsible Disclosure program and bug-bounty relationship for external security researchers.
- Published security incident response procedures and a documented Secure Software Development Lifecycle.

To date, the author is aware of no publicly disclosed material data breach at Anthropic comparable in scope to the March 2023 OpenAI/Redis incident described in the author's 2023 ChatGPT 4.0 PIA. Residual security risks specific to large language models — including prompt injection, model extraction, training data leakage, and supply-chain compromise of open-source dependencies — are analyzed in detail in §8 of this assessment.

Fundamental Principles and Rights

1. Proportionality and Necessity

The proportionality test asks whether the processing activity is appropriate to achieve its stated purpose and whether the same purpose could be achieved through less intrusive means. Applying this test to the core processing activity of Claude Opus 4.7 — responding to user prompts — it is difficult to argue that the collection of the prompt itself is disproportionate; without access to the prompt, the model cannot respond. The proportionality analysis must therefore focus on surrounding processing activities: retention beyond immediate inference needs, use of conversation data for model improvement, collection of telemetry and device metadata, and processing of sensitive content incidentally included in prompts.

On each of these dimensions, Anthropic's posture is broadly proportionate but imperfect. The move to opt-in training data use (effective October 2025) meaningfully improves proportionality; the 30-day retention default for users who do not opt in is defensible; the 2-year retention for policy-flagged content is acceptable in principle but merits clearer disclosure; and the 7-year retention of safety scores is long and should be justified with a documented proportionality analysis tied to the specific harms that longer retention is intended to prevent.

Proportionality is most strained around (a) vision-based inference, where Opus 4.7's ability to identify locations, read text in images, and recognize faces exceeds what a user might reasonably anticipate when submitting an image; and (b) the practical breadth of content users volunteer in conversation, much of which could have been anonymized or paraphrased before submission. Mitigation of these dimensions is addressed in §8.8.

2. GDPR Principles Alignment

GDPR Article 5 establishes seven principles for the processing of personal data. Claude Opus 4.7's posture against each is as follows:

Principle	Claude Opus 4.7 Posture	Gaps / Residual Risk
Lawfulness, fairness, and transparency (Art. 5(1)(a))	Privacy Policy and Usage Policy are publicly available; training opt-in is disclosed; legal bases per Table 4.	Privacy Policy reading level remains college-level; plain-language disclosures for opt-in could be improved; fairness implications of vision-based inference are underdisclosed.
Purpose limitation (Art. 5(1)(b))	Stated purposes are narrower than those of most peer services; no use for cross-contextual behavioral advertising.	Use of 'legitimate interest' for product improvement could permit purpose drift; clearer

		articulation of what training can derive is warranted.
Data minimization (Art. 5(1)(c))	Account creation now requires only an email; substantial improvement on peer services.	In-conversation data maximalism persists — users may submit vast quantities of personal data with no upstream filtering by Anthropic.
Accuracy (Art. 5(1)(d))	Users may correct account data through settings and email requests.	Generative output frequently contains inaccuracies ('hallucinations'); the right of rectification does not neatly apply to model-generated statements about individuals.
Storage limitation (Art. 5(1)(e))	Retention schedules are documented; automatic deletion implemented for 30-day retention tier.	7-year safety-score retention is long; training-pipeline retention of 5 years is defensible but should be justified; enterprise ZDR is not default.
Integrity and confidentiality (Art. 5(1)(f))	Encryption in transit and at rest; SOC 2 Type II; tenant isolation for enterprise.	LLM-specific threats (prompt injection, model extraction, training data leakage) require ongoing mitigation; no published breach to date.
Accountability (Art. 5(2))	Anthropic publishes Trust Center, system cards, Responsible Scaling Policy, and subprocessor list.	Non-public internal records (balancing tests, DPIA templates) are not disclosed; external auditability is limited to Trust Center attestations.

Table 6. GDPR Article 5 principle-by-principle alignment assessment.

3. Controls to Protect the Personal Rights of Data Subjects

Anthropic implements a mix of organizational, technical, and contractual controls to protect the personal rights of data subjects. Organizational controls include the designation of a Data Protection Officer, publication of a Trust Center, engagement with external privacy and security auditors, employee privacy training, and participation in industry safety consortia. Technical controls include encryption, role-based access, the training opt-out (now opt-in) mechanism, a one-click "delete conversation" control, an incognito chat mode, and model-side refusals for sensitive prompts. Contractual controls include a Data Processing Addendum for enterprise customers, subprocessor commitments, and the Zero Data Retention option for API customers.

For organizations deploying Claude Opus 4.7 under their own controller obligations, additional controls should be layered. Recommended controls include (a) explicit user notice within the

deploying application that Claude is being used, (b) a deploying-organization privacy notice that specifically addresses AI processing, (c) data-category gating that prevents Claude from receiving sensitive inputs such as PHI outside of BAA-covered deployments, (d) prompt-time redaction of personal identifiers, (e) output review for high-risk decisions, and (f) an internal AI governance committee with authority to block deployments that fail the controller's risk threshold.

4. Data Subject Rights and Handling of Requests

The eight data-subject rights codified by the GDPR, together with Anthropic's operationalization of each for Claude Opus 4.7, are summarized below. Each right also has parallels in U.S. state privacy laws, LGPD, and other comprehensive privacy statutes.

Right	Anthropic Mechanism	Assessment
Right to be informed (Art. 13–14)	Privacy Policy, Usage Policy, in-product consent prompts.	Present but written at college reading level; plain-language overlays recommended.
Right of access (Art. 15)	In-product download of conversations; email request for account-level data.	One-month SLA should be formalized.
Right to rectification (Art. 16)	Account data editable in settings; email for other data.	Generative outputs fall outside traditional rectification; no defined process for model misstatements about identifiable individuals.
Right to erasure (Art. 17)	In-product delete; privacy email; account closure.	Deletion reaches account and conversation data but cannot remove content from already-trained model weights.
Right to restrict processing (Art. 18)	Can opt out of training; can disable specific features.	Narrower than GDPR contemplates; for enterprise, contractual restrictions available.
Right to data portability (Art. 20)	Conversation export available in product.	Export format is machine-readable; acceptable.
Right to object (Art. 21)	Email request to privacy@anthropic.com.	Should be operationalized in self-service where feasible.
Rights related to automated decision-making (Art. 22)	Claude does not make solely-automated legal-or-similarly-significant decisions in consumer products.	Enterprise deployers must make their own Art. 22 assessments where Claude outputs drive decisions.

Table 7. Data subject rights operationalization for Claude Opus 4.7.

5. Transparency and Alignment to Privacy Policy

Anthropic's public-facing disclosures are generally comprehensive and meaningfully better than 2023-era peer disclosures. Alignment gaps that merit improvement include: (a) plain-language summaries of the training opt-in decision, especially for Pro and Max subscribers who may not read the full Consumer Terms; (b) clearer disclosure of what specifically happens to conversations flagged for policy review and for how long; (c) explicit discussion of the de-identification technique used before training; (d) notification mechanisms for changes to the subprocessor list; and (e) plain-language disclosure of vision-based inference capabilities and their privacy implications.

Where a deploying organization builds a product on top of Claude Opus 4.7, that organization must publish its own privacy notice addressing the specific processing occurring in its context. A generic reference to Anthropic's privacy policy is not sufficient under GDPR Articles 13–14 if the deploying organization is a controller for user data.

Sectoral and Local Compliance

1. Applicable Sectoral and Local Regulations

Beyond comprehensive privacy laws, Claude Opus 4.7 deployments may be subject to sector-specific privacy and technology regulations. The following are material and should be evaluated by any organization deploying the model:

- Health Insurance Portability and Accountability Act (HIPAA) and the HITECH Act — applicable where covered entities or business associates use Claude to process Protected Health Information. A Business Associate Agreement with Anthropic is required.
- Gramm-Leach-Bliley Act (GLBA) — applicable to financial institutions using Claude on non-public personal information; implicates the Safeguards Rule and Privacy Rule.
- Family Educational Rights and Privacy Act (FERPA) — applicable to educational institutions using Claude on student education records.
- Children's Online Privacy Protection Act (COPPA) — applicable to any service that knowingly collects personal information from children under 13. Anthropic's Usage Policy prohibits use by anyone under 18.
- Kids' Online Safety and Privacy Act (KOSPA) — if enacted in a form resembling current drafts, would impose design-safety and duty-of-care obligations applicable to covered platforms.
- Illinois Biometric Information Privacy Act (BIPA) — relevant where vision inputs may be construed as biometric identifiers, particularly for facial images.
- Washington My Health My Data Act and similar consumer-health-data statutes — relevant where users submit health data in-conversation.
- Payment Card Industry Data Security Standard (PCI DSS) — Anthropic's use of a third-party processor substantially reduces scope but does not eliminate oversight obligations.

2. Sector-Specific Obligations and Controls

For deployments in regulated sectors, additional controls are typically required. Healthcare deployers should operate Claude under a BAA, apply the HIPAA Minimum Necessary Standard to inputs, disable training through ZDR or enterprise settings, log all conversations, and verify breach-notification procedures. Financial-services deployers should apply the GLBA Safeguards Rule to any pipeline feeding Claude, maintain model risk management documentation consistent with SR 11-7 and OCC 2011-12, and apply fair-lending testing to any Claude-supported decisions. Educational deployers should obtain FERPA-consistent consent, avoid use with under-13 populations absent explicit parental consent and COPPA compliance, and maintain records of disclosures. Government deployers should confirm FedRAMP authorization status of the chosen deployment surface and implement additional controls consistent with NIST SP 800-53.

3. Regulatory and Standards Mapping Matrix

The table below maps the principal controls that Anthropic publicly represents to the regulatory and standards requirements they address. This mapping supports auditability and defensibility.

Control	GDPR	EU AI Act	ISO/IEC 42001	NIST AI RMF	SOC 2
Training opt-in (consumer)	Art. 6(1)(a), 7	Art. 53(1)(c)	Cl. 8.3	Govern 4.1	Privacy
Encryption in transit/rest	Art. 32	Art. 15	Cl. 8.4	Manage 2.3	Security
Subprocessor list	Art. 28(2)	Art. 25	Cl. 8.5	Govern 4.2	Security
System card publication	Art. 13–14	Art. 53(1)(a), Annex XI	Cl. 6.1.4	Govern 3.1	—
Responsible Scaling Policy	Art. 35	Art. 55	Cl. 6.1.3	Manage 1.1	—
SCCs and DPF for transfers	Ch. V	—	Cl. 8.5	Govern 4.1	Confidentiality
Role-based access controls	Art. 32	Art. 15	Cl. 8.4	Manage 2.2	Security
Incident response	Art. 33–34	Art. 73	Cl. 10.2	Manage 4.1	Availability
Bug bounty / responsible disclosure	Art. 32	Art. 15	Cl. 8.4	Manage 2.3	Security
ZDR for API customers	Art. 25	Art. 53(1)(c)	Cl. 8.3	Manage 2.1	Privacy

Table 8. Cross-walk of selected Anthropic controls to regulatory and standards frameworks.

4. European Union GDPR

The European Union's General Data Protection Regulation (GDPR) entered into force in 2016, replacing the 1995 Data Protection Directive, and companies were required to comply beginning May 25, 2018. Some variation of comprehensive data-privacy law modeled on the GDPR has now been enacted in nearly 140 countries; even for companies based in the United States, the regulation is directly relevant because of the extraterritorial application of Article 3, the widespread adoption of GDPR-aligned regimes, and the centrality of the EU–U.S. Data Privacy Framework to cross-border data flows.

GDPR takes a principles-based approach to privacy regulation. Article 5 articulates seven principles; these are analyzed against Claude Opus 4.7 in §4.2 of this assessment. The burden of ensuring compliance with these principles is placed on the data controller, a term used to refer to the entity determining how and why data is processed. For Claude Opus 4.7, the allocation of controller and processor roles is deployment-specific and is summarized in Table 2. Deployers operating as controllers must be prepared to document (a) the lawful basis for each processing purpose, (b) the outcome of balancing tests for legitimate-interest processing, (c) the records of processing activity

required by Article 30, and (d) data protection impact assessments under Article 35 for high-risk processing.

5. European Union AI Act

For any system used in the European Union or affecting EU residents, compliance with the EU AI Act — Regulation (EU) 2024/1689 — is mandatory. Because the United States follows EU data-privacy regulation closely, and because the AI Act's extraterritorial reach parallels that of the GDPR, U.S.-based AI systems should be evaluated against the Act regardless of immediate European deployment plans. The Act establishes a comprehensive legal framework for artificial intelligence and employs a risk-based approach, in which high-risk systems are subject to stringent requirements for robust data governance, transparency, human oversight, accuracy, and cybersecurity, among other obligations.

A central feature of the EU AI Act is its risk-classification schema, articulated in Title II (Articles 5–15), which organizes AI systems by risk potential and mandates differentiated obligations accordingly. The schema distinguishes prohibited practices, which the Act treats as inherently dangerous, from high-risk systems, limited-risk systems, and minimal-risk systems. Table 9 summarizes these categories and their key requirements.

Risk Category	Examples	Key Requirements
Prohibited AI Practices	Subliminal manipulation, social scoring, exploitation of cognitive vulnerabilities.	Strict prohibition on AI applications that exploit cognitive vulnerabilities, coerce users, or impose social harms.
High-Risk AI Systems	Biometric identification, employment-decision systems, law enforcement tools, critical infrastructure.	Adherence to rigorous standards for data governance, risk management, transparency, and continuous human oversight.
Limited-Risk AI Systems	Chatbots, automated email sorting.	Adherence to basic transparency and disclosure standards, with minimal regulatory obligations.
Minimal-Risk AI Systems	Spam filters, AI in video games.	Voluntary codes of conduct; no mandatory obligations.

Table 9. EU AI Act risk categories and key regulatory requirements.

Claude Opus 4.7 is not itself placed on the EU market as a product for a high-risk use case; it is a general-purpose AI model (GPAI) that can be used for a wide range of downstream applications. However, the EU AI Act introduces a distinct regime for GPAI models (Chapter V) and a heightened regime for GPAI models with systemic risk. A GPAI model is presumed to present systemic risk if it has been trained using a cumulative amount of compute greater than 10^25 floating-point operations. Claude Opus 4.7 is almost certainly above this threshold, based on publicly available performance characteristics and the multi-agent architecture announced with the model.

Under Chapter V, providers of GPAI models must (a) draw up and keep up to date technical documentation of the model; (b) make information available to downstream providers; (c) implement a policy to comply with Union copyright law; and (d) publish a sufficiently detailed summary of the content used for training. For GPAI models with systemic risk, providers must additionally perform model evaluations according to state-of-the-art protocols, including adversarial testing; assess and mitigate systemic risks; track and report serious incidents; and ensure adequate cybersecurity protection for the model and its infrastructure. Anthropic's publicly available system card, Responsible Scaling Policy, and regular model evaluations appear materially aligned with these obligations; however, formal conformity assessment records and the sufficiently-detailed-training-data summary required by Article 53(1)(d) are not fully public.

Obligations for High-Risk AI Systems.

Title III (Articles 16–29) outlines obligations unique to high-risk AI systems, addressing data integrity, risk management, auditability, and human oversight. These obligations form a regulatory architecture prioritizing reliability and accountability across the AI system lifecycle. Although Claude Opus 4.7 is not itself placed on the market for a high-risk use case, deployers of Claude in high-risk contexts (e.g., education scoring, employment decisions, credit decisioning, access to essential services) inherit the obligations of a high-risk AI system provider or deployer under the Act. Table 10 summarizes the essential obligations.

Obligation	Description	Relevant Articles
Data Governance	Enforcement of high-quality and representative datasets to minimize biases and optimize system reliability.	Article 16
Risk Management	Establishment of a robust risk-management framework encompassing design, development, and deployment.	Article 17
Technical Documentation and Traceability	Maintenance of exhaustive documentation to support auditability, including design and performance metrics.	Articles 18–21
Human Oversight	Incorporation of mechanisms to enable human intervention and control over AI outputs.	Article 19
Post-Market Monitoring and Reporting	Ongoing surveillance to detect emergent risks, with mandatory reporting of malfunctions to authorities.	Article 21

Table 10. High-risk AI system obligations and relevant EU AI Act articles.

Transparency and Information Obligations.

Chapter 4 of Title III (Articles 30–33) mandates strict transparency requirements for high-risk systems. These include provision of clear information to users regarding the system's intended

purpose, inherent capabilities, and operational constraints, and user documentation covering optimal use, potential risks, and recommended safety precautions. For chatbots and similar limited-risk systems, users must be clearly informed that they are interacting with an AI system unless that is obvious from context. Anthropic's Usage Policy expressly requires this disclosure for consumer-facing deployments.

Conformity Assessment and CE Marking.

Title IV (Articles 34–43) outlines the conformity assessment protocols that high-risk AI systems must undergo for regulatory clearance in the EU. Conformity assessment is a rigorous verification procedure designed to ensure compliance prior to market entry. Successful assessment results in CE marking (Articles 40–42), which signifies compliance and authorizes market entry.

Stage	Process	Purpose
Internal and External Audits	AI systems undergo both internal evaluations and external audits to verify comprehensive compliance.	Ensure transparency, accountability, and reliability.
CE Marking	Compliance-validated systems receive CE marking, permitting lawful entry into the EU market.	Act as a regulatory seal of conformity.
Reassessment	Periodic re-evaluation to maintain compliance after significant system updates.	Preserve system integrity and ongoing regulatory adherence.

Table 11. Stages of conformity assessment under the EU AI Act.

Governance and Enforcement.

Title V (Articles 44–61) establishes a governance and enforcement infrastructure, creating the European Artificial Intelligence Board (EAIB) to oversee regulatory implementation and ensure uniform enforcement across Member States. The EAIB coordinates national regulatory authorities, issues guidelines, and develops best practices. Article 58 prescribes substantial penalties for violations, with fines reaching up to €35 million or 7% of an entity's global annual turnover for the most serious infringements — demonstrating the Act's commitment to rigorous enforcement.

Risks and Mitigations

1. Privacy and Compliance Risk Analysis

Privacy risks for Claude Opus 4.7 are evaluated using a qualitative likelihood-impact matrix consistent with the Digital 520 PIA methodology. Likelihood is rated on a three-point scale (Low, Moderate, High), representing the probability that the risk is realized in ordinary operation. Impact is rated on a three-point scale, representing the combined severity of financial, regulatory, reputational, and individual-harm consequences if the risk is realized. Residual risk reflects the author's assessment after accounting for Anthropic's documented mitigations.

#	Risk	Inherent Likelihood	Inherent Impact	Residual Risk
R1	Unauthorized access to data at rest or in transit	Low	High	Low–Moderate
R2	Training-data memorization leakage via generative output	Moderate	Moderate	Moderate
R3	Prompt-injection-driven exfiltration or action	High (agentic)	High	Moderate
R4	Vision-based inference of sensitive attributes	High	Moderate	Moderate–High
R5	Under-18 users accessing the platform	High	High	Moderate–High
R6	Function creep / purpose drift in training use	Moderate	Moderate	Moderate
R7	Excessive collection / over-retention	Moderate	Moderate	Low–Moderate
R8	Unwanted modification of conversational data or outputs	Low	Moderate	Low
R9	Data disappearance / loss	Low	Moderate	Low
R10	Unlawful cross-border transfer to non-adequate jurisdictions	Low	Moderate	Low–Moderate
R11	Ambiguity in subprocessor chain / purpose	Moderate	Low	Low
R12	Model extraction or theft of Anthropic IP	Moderate	Low (for data subjects)	Low
R13	Trust & Safety over-retention beyond proportionality	Moderate	Moderate	Moderate

R14	Inaccurate generative outputs about identifiable individuals	High	Moderate	Moderate
R15	Opaque de-identification technique for training pipeline	Moderate	Moderate	Moderate

Table 12. Privacy and compliance risk inventory.

2. High-Risk Processing and DPIA Triggers

GDPR Article 35 requires a Data Protection Impact Assessment (DPIA) where processing is likely to result in a high risk to the rights and freedoms of natural persons. The Article 29 Working Party (now EDPB) guidelines identify nine criteria; processing that meets two or more typically requires a DPIA. Evaluating Claude Opus 4.7 against these criteria:

DPIA Criterion (EDPB)	Applicable to Opus 4.7?	Notes
Evaluation or scoring	Potentially	If deployer uses outputs for scoring.
Automated decision-making with legal/similar effect	Deployment-dependent	Consumer products: generally no. Enterprise decisioning use: yes.
Systematic monitoring	Potentially	Long-context agentic workflows can monitor user behavior.
Sensitive or highly personal data	Yes (volunteered)	Health, beliefs, sexuality volunteered regularly.
Data processed on a large scale	Yes	Millions of users globally.
Matching or combining datasets	Yes (in training)	Diverse sources combined during pre-training.
Data of vulnerable subjects	Yes	Despite 18+ policy, minors are present; students, patients via deployers.
Innovative use of new technologies	Yes	Frontier LLMs are novel.
Prevention of exercise of a right / service	Sometimes	Claude refusals can indirectly affect service access.

Table 13. EDPB DPIA trigger criteria evaluated against Claude Opus 4.7 deployments.

Claude Opus 4.7 meets at least four EDPB DPIA-trigger criteria in most deployments. Organizations deploying the model as controllers should therefore conduct a full DPIA under Article 35, building on the analysis in this PIA and augmenting it with deployment-specific facts, consultation with data subjects or their representatives where appropriate under Article 35(9), and, in close calls, prior consultation with the competent supervisory authority under Article 36.

3. Unauthorized Access to Data

Unauthorized access risk includes external attackers, insider threats, and inadvertent over-permissioning. Anthropic's published controls (TLS, encryption at rest, role-based access, SOC 2 Type II, bug bounty) materially reduce the inherent risk. LLM-specific attack surfaces warrant explicit discussion:

- Prompt injection attacks, in which malicious content embedded in documents, web pages, or tool outputs attempts to override the model's instructions. Opus 4.7 demonstrates industry-leading robustness, but agentic deployments (especially with broad tool access) remain vulnerable under the worst-case assumption that any external input may be adversarial.
- Model extraction and parameter stealing, which could enable reconstruction of model weights or decision boundaries; mitigated by API rate limiting, query monitoring, and contractual prohibitions.
- Membership inference and training data leakage, in which adversaries probe the model to determine whether specific records were in the training set. Differential privacy techniques and careful de-identification are the recognized mitigations; Anthropic does not publicly disclose its specific approach.
- Supply-chain compromise of open-source dependencies, which was the root cause of the 2023 OpenAI/Redis incident referenced in the author's prior PIA. All LLM providers remain exposed to this class of risk, which is mitigated by software composition analysis, dependency pinning, and incident-response maturity.

4. Unwanted Modification of Data

Integrity risk — the risk of unauthorized modification of conversational data, account records, or model weights — is mitigated by versioning, immutable audit logging, signed deployments, and strict change control. Risk to data subjects is that conversation records or outputs could be tampered with post hoc, potentially affecting rights exercise. Anthropic's publicly disclosed controls appear adequate; residual risk is Low.

5. Data Disappearance

Availability risk includes service outages, data loss events, and deletion-error events. Anthropic's cloud-native architecture, multi-region redundancy, and backup procedures provide strong availability guarantees. A specific availability concern for users is that user-initiated deletion may be reversed inadvertently by backup restoration; the Privacy Policy addresses this with the 30-day back-end purge window. Residual risk is Low.

6. Function Creep and Purpose Drift

Function creep occurs when data collected for one purpose is re-used for purposes that were not clearly disclosed. For Claude Opus 4.7, the principal function-creep vectors are (a) use of conversation content beyond the narrow service-delivery purpose (mitigated by the opt-in training model and incognito mode); (b) use of telemetry for purposes beyond product improvement

(mitigated by legitimate-interest balancing and the absence of an advertising business model); and (c) use of Trust & Safety flags for purposes beyond safety enforcement. Residual risk is Moderate and is best mitigated by strict purpose-limitation contractual commitments for enterprise deployments and clear in-product disclosures for consumers.

7. Excessive Collection and Unnecessary Retention

As noted throughout this assessment, Anthropic's account-creation collection is materially leaner than peer services. The remaining excessive-collection risk concerns in-conversation content, which is entirely at the user's discretion and which Anthropic does not pre-filter. Retention is largely proportionate, with the 7-year safety-score retention representing the most significant outlier. Residual risk is Low–Moderate, reducible through clearer user-facing nudges to redact sensitive data before submission and through enterprise ZDR for regulated deployments.

8. Planned or Existing Measures for Mitigation

The following table summarizes mitigations relevant to each identified risk, distinguishing measures that are already implemented by Anthropic from measures that are recommended for deployer organizations.

#	Risk	Anthropic Mitigations	Deployer-Level Recommended Mitigations
R1	Unauthorized access	TLS, at-rest encryption, RBAC, SOC 2, bug bounty	SSO enforcement, conditional access, monitoring of anomalous usage
R2	Training-data memorization leakage	De-identification pre-training; evaluation for memorization	Avoid submitting personal data; enterprise ZDR
R3	Prompt-injection	Injection-robust alignment training; Gray Swan testing	Tool scope minimization; human-in-the-loop for consequential actions
R4	Vision-based inference	Usage Policy prohibits biometric identification	Block or redact images; disclose vision capabilities to end-users
R5	Under-18 access	18+ self-attestation; Usage Policy prohibition	Deployer-side age-gating; KOSPA/COPPA-compliant parental consent flows
R6	Function creep	Clear retention periods; opt-in training	Contractual purpose limitation; periodic policy review
R7	Excessive collection/retention	Minimal account fields; 30-day default; ZDR option	DLP at prompt submission; redaction pipelines

R8	Unwanted modification	Versioning, immutable logging, change control	Cryptographic signing of model outputs where evidentiary value matters
R9	Data disappearance	Multi-region redundancy; backup procedures	Customer-side archival for compliance records
R10	Transfer to non-adequate jurisdictions	SCCs, DPF, adequacy decisions	Transfer-impact assessments; region selection via cloud resellers
R11	Subprocessor ambiguity	Published subprocessor list	Subprocessor approval workflow; alerting on list changes
R12	Model extraction	Rate limiting; query monitoring	Monitor for abusive query patterns in deployer tenant
R13	Trust & Safety over-retention	Documented retention schedules	Where permitted, negotiate shorter retention in enterprise DPA
R14	Inaccurate outputs about individuals	Hallucination-reduction training; refusal behaviors	Human review of outputs referencing identifiable individuals
R15	Opaque de-identification	Privacy Policy references de-identification	Request technique disclosure under DPA; add contractual audit rights

Table 14. Risk-to-mitigation mapping. Deployer measures should be tailored to organizational risk appetite.

Validation and Governance

1. Risk Mapping and Data Flow Diagram

Because this PIA is published as a standalone document and cannot contain a fully faithful rendering of Anthropic's internal data flows, the following conceptual diagram describes the principal data flows for Claude Opus 4.7 consumer deployments. Deployers and enterprise customers should construct data-flow diagrams specific to their own systems as part of their DPIA.

Stage	Actors	Personal Data Elements	Controls
1. User access	End-user → Claude.ai web/mobile	IP, user agent, email, auth token	TLS, SSO, session mgmt
2. Session creation	Claude.ai → Anthropic API gateway	Session token, tenant ID	Rate limit, fraud detection
3. Prompt submission	End-user → Claude.ai → model	Prompt text, uploaded files, images	Tenant isolation, content filters
4. Inference	Model (Opus 4.7) → response	Transient context window; outputs	Alignment training, refusals
5. Storage	Response, prompt → backend	Conversation record, metadata	At-rest encryption, RBAC
6. Safety review (if flagged)	Backend → Trust & Safety	Flagged content, safety scores	Role restriction, purpose limitation
7. Training pipeline (if opt-in)	Backend → de-id → training	De-identified prompt/response pairs	De-identification; 5-year retention
8. Cross-border transfer	Anthropic US ↔ EU reps/cloud	All categories	SCCs, DPF, adequacy
9. Data subject rights	User → privacy@anthropic.com	Access/deletion/rectification	30-day SLA, verification
10. Deletion	Backend → purge	All conversation data	30-day back-end purge window

Figure 1 / Table 15. Conceptual data flow for Claude Opus 4.7 consumer deployments.

2. Action Plan

The following action plan prioritizes remediations identified in this assessment. Each action is classified as Required, Recommended, or Optional. "Required" means, in the author's opinion, needed to achieve defensible compliance posture for controllers deploying Claude Opus 4.7. "Recommended" items materially strengthen the privacy posture. "Optional" items represent best-practice enhancements.

#	Action	Owner	Classification	Target Timeline
A1	Publish plain-language training opt-in disclosure with reading level ≤8th grade	Anthropic	Recommended	Q2 2026
A2	Disclose de-identification technique and re-identification testing cadence	Anthropic	Recommended	Q2 2026
A3	Provide self-service Article 21 right-to-object interface	Anthropic	Recommended	Q3 2026
A4	Publish sufficiently-detailed training data summary per EU AI Act Art. 53(1)(d)	Anthropic	Required (for EU)	Next model release
A5	Strengthen age-assurance beyond self-attestation for Claude.ai	Anthropic	Recommended	Q3 2026
A6	Extend Zero Data Retention to consumer subscription tiers on request	Anthropic	Optional	N/A
A7	Implement subprocessor-change email notifications	Anthropic	Recommended	Q2 2026
A8	Publish balancing-test summaries for legitimate-interest bases	Anthropic	Recommended	Q3 2026
B1	Conduct organization-specific DPIA before Claude deployment	Deployer	Required	Pre-deployment
B2	Implement prompt-time DLP / redaction	Deployer	Recommended	Pre-deployment
B3	Disclose AI involvement to end-users	Deployer	Required	Pre-deployment
B4	Execute DPA with Anthropic and review subprocessor list	Deployer	Required	Pre-deployment
B5	Enforce SSO and conditional access	Deployer	Recommended	Pre-deployment
B6	Establish human-in-the-loop review for consequential outputs	Deployer	Required	Pre-deployment
B7	Apply sector-specific controls (BAA, GLBA, FERPA)	Deployer	Required (sector-dependent)	Pre-deployment
B8	Annual re-review of this PIA and deployer DPIA	Deployer	Required	Annual

Table 16. Action plan for Anthropic (A-series) and deployer organizations (B-series).

3. Accountability, Monitoring, and Review

This PIA should be reviewed and, where appropriate, reissued under the following triggers: (1) a new major Claude model release (for example, Claude Opus 5 or a material architectural change to Opus 4.7); (2) a material change to Anthropic's Privacy Policy, Usage Policy, Consumer Terms, or subprocessor list; (3) enactment or material amendment of any regulation referenced in this document; (4) a material security or privacy incident affecting Anthropic; or (5) identification of new categories of risk not addressed in this version.

For deployer organizations, ongoing monitoring should include (a) quarterly review of the Anthropic subprocessor list, (b) semiannual review of this PIA for continued applicability, (c) annual update of the organization's internal DPIA, (d) continuous monitoring for high-severity safety and security advisories from Anthropic, and (e) integration with the organization's broader AI governance cadence consistent with the AI Governance Stack framework summarized in Appendix A.

4. Approval and Sign-off

This Privacy Impact Assessment has been prepared by Noah M. Kenney, Principal Consultant of Digital 520, in his capacity as the assessment's author. The assessment reflects the author's independent professional analysis of publicly available information and is released publicly for educational and informational purposes. Approval for release rests with the author. Organizations adopting this PIA for their own governance purposes should countersign an internal adoption record and cross-reference it to their records of processing activities.

Role	Name	Date	Signature
Author and Principal Consultant	Noah M. Kenney	April 17, 2026	/s/ Noah M. Kenney
Publishing Organization	Digital 520	April 17, 2026	/s/ Noah M. Kenney
Deployer Privacy Lead (to be completed)	_____	_____	_____
Deployer AI Governance Lead (to be completed)	_____	_____	_____

Table 17. Approval and sign-off record.

Appendix A — AI Governance Stack Mapping

The AI Governance Stack introduced in Governing Intelligence (Kenney, 2026) decomposes AI governance into five interdependent layers: Data Governance; Model Governance; System Integration Governance; Control & Monitoring Governance; and Audit & Evidence Governance. The following table summarizes Claude Opus 4.7's posture at each layer and identifies areas where public evidence would strengthen the governance claim.

Layer	Anthropic Public Evidence	Residual Gap / Recommendation
Layer 1 — Data Governance	Public Privacy Policy; opt-in training; de-identification reference; copyright-compliance policy for GPAI.	No public disclosure of data-quality thresholds, bias assessment methodology, or provenance-tracking architecture.
Layer 2 — Model Governance	Published system card; Responsible Scaling Policy; alignment evaluations; architecture review via ASL process.	Fairness-testing methodology for Opus 4.7 is not fully disclosed; interpretability guarantees are limited for a generative model.
Layer 3 — System Integration Governance	Documented API; enterprise DPA; tenant isolation; tool-use policies.	Agentic deployments require deployer-side circuit breakers and cascading-failure analyses not provided by default.
Layer 4 — Control & Monitoring Governance	Role-based access; performance monitoring; incident response; ASL-3 release gating.	Drift and fairness monitoring for live production is not publicly described at Opus 4.7 granularity.
Layer 5 — Audit & Evidence Governance	Trust Center attestations; SOC 2 Type II; ISO 27001 alignment; published system card.	Full conformity assessment records for EU AI Act GPAI-systemic-risk obligations are not yet public.

Table A1. AI Governance Stack mapping for Claude Opus 4.7.

The AI Governance Stack is a general-purpose framework; organizations deploying Claude Opus 4.7 should build their own layered governance posture on top of Anthropic's published controls. A full treatment of the Stack, including requirement sets (DG-1 through AE-n), decision rules, verification criteria, and failure modes, is provided in Chapter 2 of Governing Intelligence.

Appendix B — About the Author and Digital 520

Noah M. Kenney is the Founder and Principal Consultant of Digital 520, a global consultancy specializing in digital transformation, data privacy, AI governance, cybersecurity, and compliance. Digital 520 partners with regulated enterprises, high-growth companies, and mission-driven organizations to increase operational efficiency and drive organizational growth.

Noah serves as President and Chief Scientist of the Disruptive AI Lab, where he focuses on applying AI in high-risk and regulated environments, including healthcare and critical infrastructure. He also serves as President of the Ethical Tech Forum, a global think tank advancing responsible AI, privacy, and emerging-technology governance. Noah has consulted on over forty AI initiatives, holds more than fifty advanced industry certifications including the Certified Information Privacy Manager (CIPM) credential from the International Association of Privacy Professionals, and co-developed the country's first AI Privacy Engineering course at the Georgia Institute of Technology. He earned his undergraduate degree in Economics with high honors from Georgia Tech and a Master's of Engineering from the University of Colorado Boulder.

Noah is the author of Governing Intelligence: Law, Privacy, Security, and Compliance in the Age of Artificial Intelligence (first edition, 2026), which establishes the AI Governance Stack framework applied in this assessment. The textbook provides a full specification of the Stack, deep dives on the GDPR, the EU AI Act, U.S. privacy laws, sector-specific regimes, AI privacy engineering, cybersecurity for AI, auditing methodologies, and building enterprise AI compliance programs.

Work With Digital 520

If this assessment has been useful to your organization, Digital 520 is available to build Privacy Impact Assessments, Data Protection Impact Assessments, and AI governance programs tailored to your specific AI systems, regulatory jurisdictions, and risk appetite. Our engagements apply the same methodology, framework, and rigor documented in Governing Intelligence and in this public assessment of Claude Opus 4.7. Typical engagements include:

- Privacy Impact Assessments for first-party AI products, third-party AI integrations, and enterprise AI platforms.
- GDPR and U.S. state Data Protection Impact Assessments for high-risk processing activities.
- EU AI Act conformity-assessment readiness reviews for general-purpose AI models and high-risk AI systems.
- AI Governance Stack maturity assessments and implementation roadmaps.
- AI privacy engineering reviews covering differential privacy, synthetic data, de-identification, and privacy-preserving machine learning.
- Executive briefings on emerging AI regulation across the EU, US, UK, and other jurisdictions.

Legal Disclaimer

This publication is provided for informational and educational purposes only and does not constitute legal, regulatory, compliance, or professional advice. The content reflects the author's independent analysis of publicly available information about Claude Opus 4.7 as of April 2026 and is not based on any insider access, confidential documentation, or privileged communications with Anthropic, PBC. Claude Opus 4.7 is a trademark of Anthropic, PBC. Digital 520 is not affiliated with Anthropic, PBC.

This Privacy Impact Assessment is a point-in-time analysis. AI governance is a rapidly evolving field; laws, regulations, product behaviors, and organizational practices change frequently. Readers should independently verify all facts and consult qualified legal counsel, privacy professionals, and the Anthropic Trust Center for decisions pertaining to their own organizations.

Findings and recommendations represent the author's professional opinion. They do not establish non-compliance on the part of Anthropic or any other party and should not be construed as such. Residual risk ratings reflect the author's analysis and will vary based on deployment context, organizational risk appetite, and regulatory jurisdiction.

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Governing Intelligence: Law, Privacy, Security, and Compliance in the Age of Artificial Intelligence — available now.