

# Part B Section 3: Implementation

## - Senior AI

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*For EIC Accelerator Application Part B Target: 3-5 pages DRAFT VERSION -  
Based on current available information*

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### 3. IMPLEMENTATION

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#### 3.1 Work Plan Overview

Senior AI will execute an 18-month acceleration program advancing from TRL 5 to TRL 8, transforming our validated lab prototype into a certified, production-ready platform qualified through 10-15 operational pilots with 250-450 elderly users.

##### Three-Phase Strategy:

- **Phase 1 (M1-M6): Foundation → TRL 6** - Freeze security architecture, deliver end-to-end alpha with BankID sandbox, establish compliance framework
- **Phase 2 (M7-M12): Validation → TRL 7** - Feature-complete beta, penetration testing, accessibility pre-audit, BankID production approval, launch multi-site pilots
- **Phase 3 (M13-M18): Qualification → TRL 8** - Complete certifications (EN 301 549, GDPR validation, ISO/IEC 42001), conclude pilots with impact data, production v1.1

##### Work Package Structure:

We have designed 8 integrated work packages ensuring systematic development:

1. **WP1 - Project Management, Risk & Ethics** (M1-M18): Deliver on time/budget, manage comprehensive risk register (€790k mitigation budget), ensure ethical treatment of vulnerable users, protect IP
2. **WP2 - Architecture, Security & Privacy-by-Design** (M1-M12): Zero-trust architecture, GDPR-by-design, BankID security foundation, DPIA

3. **WP3 - Core Platform & Conversation Engine** (M1-M18): Production-ready conversation system with non-destructive branching, Conversation Atlas interface, voice stack (STT/TTS), MLOps infrastructure
4. **WP4 - Accessibility UX & Human-Centered Design** (M1-M18): EN 301 549 conformance, elderly-optimized UX, cognitive accessibility, iterative testing with 60-80 users
5. **WP5 - BankID Integration & Agent Security** (M2-M15): Secure authentication/signing, agent execution framework, scam protection, production approval
6. **WP6 - Regulatory Compliance & Certification** (M2-M18): GDPR validation, EN 301 549 certification, ISO/IEC 42001 AI management system, avoid MDR classification
7. **WP7 - Pilot Testing & User Validation** (M4-M17): 10-15 pilots across Swedish/Norwegian municipalities and care providers, real-world validation, impact measurement
8. **WP8 - Market Readiness & Exploitation** (M6-M18): Go-to-market strategy, partnership pipeline, procurement packages, Series A preparation

**Critical Dependencies:** - WP2 security freeze (M3) gates WP3/WP5 development - WP6 DPIA approval (M3) gates WP7 pilot launch (M7) - WP5 BankID sandbox (M4) gates production integration (M12) - WP7 pilot beta (M9) requires WP3 feature-complete platform - WP6 certifications (M15) require WP3 production v1.0 (M12) + WP4 accessibility validation

## 3.2 Key Milestones & Success Criteria

Milestone	Date	Success Criteria
<b>MS1: Security Architecture Freeze</b>	M3	Zero-trust design, threat models, DPIA v1 approved
<b>MS2: Alpha Release</b>	M6	E2E system, 4 domains, voice+cards operational
<b>MS3: Beta Release</b>	M9	Feature-complete, 8-10 domains, usability tested (n=30), SLOs met
<b>MS4: Production v1.0</b>	M12	BankID production ready, performance validated (<1.2s P95 latency)
<b>MS6: Accessibility Pre-Audit</b>	M10	EN 301 549 gaps remediated, pre-audit passed
<b>MS7: BankID Production Approval</b>	M12	Official approval, security review passed

Milestone	Date	Success Criteria
<b>MS8: Penetration Test Pass</b>	M9	External pentest passed, vulnerabilities remediated
<b>MS9: Certifications Complete</b>	M15	EN 301 549 certified, GDPR validated, ISO/IEC 42001 implemented
<b>MS10: 10 Pilots Live</b>	M12	10 sites, 200+ users, safety monitoring functional
<b>MS11: Pilots Completed</b>	M16	Impact data collected, TRL 8 demonstrated
<b>MS5: Final Review</b>	M18	All deliverables complete, investment-ready

**TRL 8 Validation Criteria:** -  System complete and qualified through operational testing in 10-15 real-world environments -  250-450 elderly users (age 65-85+) successfully completing tasks across 10+ domains -  Task completion rates >80%, user satisfaction (SUS) >70, NPS >30 -  Security certifications: penetration test passed, GDPR validated, BankID production approved -  Accessibility certified: EN 301 549 conformance achieved -  Safety record: zero sentinel events, <2% major incident rate -  Performance targets met: <1.2s P95 UI latency, <300ms STT partials, 99.5% availability -  Municipal/care provider validation: procurement-ready packages accepted

### 3.3 Team Capabilities & Resource Plan

**Current Strengths:** - 2 Founders with complementary technical and business expertise - Validated technical prototype demonstrating feasibility - Deep understanding of target user needs through preliminary research - Established relationships with potential pilot partners

#### Planned Team Growth (Target: 9-11 FTEs by M12):

*Technical Core (Months 1-4):* - Senior AI/ML Engineers x2: Conversation engine, safety guardrails, MLOps - Platform Engineers x2: Card UI, voice stack, infrastructure - UX/Accessibility Designer: EN 301 549 compliance, elderly-optimized design - DevSecOps Engineer: Zero-trust architecture, BankID integration, pentesting

*Business/Operations (Months 2-9):* - BD/Partnerships Manager: Municipal procurement, care provider partnerships - Customer Success/Pilot Coordinator: Pilot execution, user support - Data Analyst: Pilot evaluation, impact measurement

*External/Fractional:* - DPO (Data Protection Officer): GDPR compliance (0.3 FTE retainer) - Security consultants: Pentesting, architecture review - Accessibility consultants:

Certification support - Privacy legal counsel: DPIA, DPA negotiations - ISO/IEC 42001 consultant: AI management system

**Advisory Board (M1-M3):** - Gerontology/geriatrics expert - Cybersecurity/financial crime expert  
- Clinical ethicist - Digital inclusion specialist - Municipal welfare technology advisor

**Recruitment Strategy:** - Dedicated recruiter (Month 1) - Remote-friendly Nordic/EU hiring to access broader talent pool - Competitive equity packages - Clear mission-driven positioning (accessibility, security for vulnerable users) - Internship pipeline for junior talent

**Key Person Risk Mitigation:** - Architecture/runbook documentation - Dual ownership of critical components - Cross-training protocols - Code review requirements - Disaster recovery exercises

## 3.4 Budget Allocation

**Total Grant:** €2,500,000 over 18 months

**Personnel (€1.2M, 48%):** - Technical team (AI/ML, platform, DevSecOps, UX): €850k - Business/operations (BD, CS, analysis): €250k - Founders: €100k

**External Services (€330k, 13%):** - Security: €90k (pentesting €70k, reviews €20k) - Accessibility: €60k (certification €50k, consulting €10k) - GDPR/Privacy: €70k (DPO €30k, legal €40k) - ISO/IEC 42001: €70k (implementation €40k, audit €30k) - BankID: €40k (vendor support, certification)

**Pilot Costs (€160k, 6%):** - Participant/site incentives: €100k - Travel and field operations: €40k - Support infrastructure: €20k

**Infrastructure (€240k, 10%):** - Equipment (testing devices, tablets): €120k - Cloud/compute: €80k - LLM APIs: €40k

**Other (€70k, 3%):** - Travel/meetings: €40k - Dissemination/branding: €30k

**Indirect Costs (€500k, 20%):** Flat 25% of direct costs

**Risk Contingency:** €300k dedicated reserve (part of external services budget, released only for approved contingency actions)

## 3.5 Risk Management Approach

We maintain a comprehensive risk register across four categories with €790k total mitigation budget:

**Technical Risks (€240k mitigation):** - *AI reliability with vulnerable users:* Confidence gating, guardrails, deterministic fallbacks, red-team testing (€50k) - *BankID complexity:* Early sandbox integration (M2), certified SDKs, vendor support, security reviews (€70k) - *Voice/accessibility challenges:* ASR/TTS tuning for elderly Swedish/Norwegian speakers, usability labs (€50k) - *Security vulnerabilities:* DevSecOps pipeline, OWASP ASVS L2, external pentests, threat modeling (€70k)

**Resource Risks (€105k mitigation):** - *Talent acquisition:* Dedicated recruiter, remote-friendly policies, competitive equity, contractor bench (€40k) - *Key person dependency:* Documentation, dual ownership, cross-training, runbooks (€15k) - *Budget overruns:* Monthly burn monitoring, 90-day reforecasts, stage-gates (€15k) - *Pilot recruitment:* Over-recruit LOIs (20+ for 10-15 sites), partnerships with PRO/SPF, multi-country strategy (€35k)

**Regulatory/Compliance Risks (€175k mitigation):** - *GDPR violations:* DPO retainer, DPIA/LIA, EU-only residency, Schrems II compliance, audit logs (€60k) - *Accessibility certification failures:* Early gap analysis, iterative audits, cognitive testing, second lab if needed (€70k) - *Medical device classification:* MDR counsel, avoid diagnostic claims, "information/support" positioning (€20k) - *BankID approval delays:* Pre-submission reviews, conformance checklist, fallback to Freja eID (€25k)

**Market/Partnership Risks (€70k mitigation):** - *Municipal procurement delays:* Pre-tender engagement, framework positioning, procurement advisor (€35k) - *Pilot site failures:* Clear protocols, safety monitoring (PSMC), support resources (€20k) - *Low adoption/churn:* Habit-building features, onboarding support, iterative improvements (€15k)

**Risk Governance:** - Monthly risk reviews with mitigation actions - Quarterly stage-gate decisions (continue/pause/pivot) - Independent Pilot Safety Monitoring Committee (PSMC) with authority to pause - €300k contingency reserve requiring formal approval for release - Scenario planning for critical dependencies

## 3.6 Pilot Program Strategy

**Target:** 10-15 operational pilots, 250-450 elderly users (age 65-85+), multiple operational environments

**Pilot Mix:** - Swedish municipalities (digital inclusion, welfare tech): 6-8 pilots - Norwegian municipalities (velferdsteknologi): 2-3 pilots - Private care providers (Attendo, Vardaga, Humana): 4-5 pilots

**Pilot Structure:** - Duration: 8-12 weeks per site - Participants: 20-40 users per site - Paid pilot model: €300-600 per participant (signals value, reduces churn) - Site coordinators trained and supported

**Recruitment Timeline:** - M5-M10: Outreach and LOI collection (target: 20+ sites for 10-15 active) - M7-M9: First wave (5 sites launched) - M10-M12: Second wave (5 additional sites) - M12-M15: Third wave (final 3-5 sites, if needed)

**Realistic Sales Cycles Accounted For:** - Swedish municipalities: 4-8 months (direct procurement paths prioritized) - Norwegian municipalities: 3-6 months (LUP procedures) - Private care providers: 2-4 months (site manager sponsorship)

#### **Pilot Evaluation Framework:**

*Quantitative Metrics:* - Task completion rates by domain (target: >80%) - Time savings vs. traditional methods (target: 50-80% reduction) - Weekly active usage rate (target: >60%) - Error rates and recovery success - Technical performance (latency, availability)

*Qualitative Metrics:* - Digital self-efficacy improvement (eHEALS scale) - System usability (SUS, target: >70) - Net Promoter Score (NPS, target: >30) - Caregiver burden reduction (interviews) - Safety and confidence (thematic analysis)

**Safety Monitoring:** - Pilot Safety Monitoring Committee (PSMC): independent experts with pause authority - Real-time distress signal monitoring - Financial transaction review (scam protection validation) - Incident tracking and 24-hour reporting - GDPR breach procedures (72-hour DPA notification) - Monthly PSMC reviews

**Ethics & Consent:** - Ethics approval from Swedish Ethical Review Authority (M1-M2) - Capacity-first consent with teach-back verification - Plain language (B1 reading level), large fonts, multimodal formats - Ongoing consent and easy opt-out - Proxy consent procedures for cognitively impaired (when appropriate) - Respect for dissent at all times

## **3.7 Regulatory Compliance Strategy**

**GDPR (Vulnerable User Data):** - DPO retainer from M2 - DPIA completed and approved (M3) before pilot launch - EU-only data residency (avoid US Cloud Act/Schrems II issues) - Data Processing Agreements with all municipalities/partners - Data minimization and purpose limitation enforced in schemas - Consent management, data subject rights (access, erasure, portability) - Breach notification procedures (72-hour ready) - Regular privacy audits

**Accessibility (EN 301 549):** - Gap analysis (M6-M7) - Iterative remediation sprints (M8-M13) - Pre-audit with certification lab (M10) - Fix critical blockers (M11-M13) - Final certification audit (M14-M15) - Target: Full conformance, including cognitive accessibility

**AI Management System (ISO/IEC 42001):** - Implementation M8-M18 - AI risk assessment framework - Bias and fairness testing protocols - Transparency and explainability

measures - Human oversight procedures - Continuous monitoring - Certification audit M18-M20 (may extend slightly beyond grant)

**Medical Device Risk Mitigation:** - Regulatory counsel review (M2-M6) - Avoid diagnostic/therapeutic claims - "Information and support" positioning only - Disclaimers and escalation to healthcare providers - Document non-medical device rationale

**BankID Production Approval:** - Sandbox integration (M2-M6) - Security documentation and conformance checklist - Pre-submission review with BankID team (M8-M10) - Production approval target: M12 - Fallback: Freja eID if delays occur

## 3.8 Market Readiness & Exploitation

### Go-to-Market Strategy:

*B2C Direct:* - Pricing: €8-12/month subscription - Channels: Digital marketing (targeting adult children/caregivers), partnerships with pensioner organizations (PRO, SPF Seniorerna), pharmacies, libraries - CAC target: €120-250 digital, blended €70-150 with partnerships

*B2B2C Municipal:* - Pricing: €6-9/user/month - Procurement strategy: Direct procurement (under thresholds), framework agreements, pilot-to-production bridges - Sales cycle: 9-15 months (accounted for in projections) - Decision criteria: GDPR compliance (DPAs, DPIA), accessibility (EN 301 549), security (KLASSA-aligned), non-medical positioning

*B2B2C Care Providers:* - Pricing: €6-8/user/month - Value proposition: Staff time reduction (50-80% target), resident autonomy, differentiation - Sales cycle: 2-4 months (faster than municipal)

*B2B2C Health Payers & Telcos:* - Value-add/CSR bundles - Preventive care positioning (insurers) - Digital inclusion positioning (telcos)

**Partnership Pipeline Development (M6-M18):** - Pre-tender dialogues with municipalities - Partnerships with care providers (Attendo, Vardaga, Humana in Sweden; Attendo Norge, Stendi in Norway) - Health payer discussions (Folksam, Länsförsäkringar, Gjensidige, Storebrand) - Telco partnerships (Telia, Tele2, Telenor) - Procurement advisor engaged (€20k) to navigate Swedish LOU and Norwegian LOA

**Procurement-Ready Packages (M15):** - GDPR documentation (DPAs, DPIA, Records of Processing) - Security documentation (ISO 27001 roadmap, KLASSA alignment) - Accessibility statements (EN 301 549 certification) - Service Level Agreements - Implementation playbooks and training materials - Pricing and contract templates

**Investment Readiness (M18):** - Business model validated through pilot conversions - Unit economics demonstrated (COGS €0.18-0.36/user/month, 94-98% gross margin) -

Financial projections updated with actuals - Series A target: €10-20M for Nordic scaling - Pitch deck, data room, investor outreach preparation

## 3.9 Post-Grant Scaling Plan (TRL 9, Investment Phase)

**WP9-12 (Months 19-36, Investment Phase):**

- **WP9 - Production Infrastructure Scaling:** Multi-region deployment, 100k+ user capacity, performance optimization
- **WP10 - Municipal Rollout:** Framework agreements, 25+ municipalities, 10,000+ users
- **WP11 - Market Expansion:** Care provider scaling, health payer partnerships, Nordic expansion (Norway, Denmark, Finland)
- **WP12 - Advanced Features:** 20+ task domains, enhanced memory features, family coordination tools

**Funding:** Series A (€10-20M) for go-to-market acceleration, team scaling (25-30 FTEs), certification expansion (additional EU markets)

**Targets (Year 3 post-grant):** - 50,000+ active users - 50+ municipalities and care providers - Break-even or near break-even - Demonstrated unit economics at scale - Series B readiness for European expansion

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## Summary

Senior AI's 18-month implementation plan systematically advances from TRL 5 to TRL 8 through:

- Rigorous technical development** with security-first, accessibility-first design
- Real-world validation** through 10-15 operational pilots with 250-450 elderly users
- Comprehensive compliance** achieving EN 301 549, GDPR, ISO/IEC 42001, and BankID certifications
- Proactive risk management** with €790k mitigation budget and independent safety oversight
- Strong team capabilities** scaling to 9-11 FTEs with advisory board support
- Market readiness** with procurement packages, partnership pipeline, and Series A preparation

Our plan balances technical innovation with the unique requirements of serving vulnerable users, ensuring both breakthrough performance and uncompromising safety. By M18, we

will have a certified, investment-ready platform validated in operational environments, positioned for rapid Nordic scaling.

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**Next Steps:** Review with team, integrate with Part B Sections 1 (Excellence) and 2 (Impact), final polish

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*This section supports the EIC Accelerator Full Application (Part B) for Senior AI.*