

Constitutional Memory

BlackVault™ — Sovereign AI Memory Infrastructure

1. The Structural Problem the EU AI Act Cannot Solve Alone

Every European enterprise using AI — from an automotive manufacturer in Stuttgart to a bank in Madrid — faces a problem that regulation alone cannot fix. The AI systems they depend on — Microsoft Copilot, ChatGPT, Gemini — are architecturally designed so that corporate memory and intelligence are fused. When an employee sends a prompt, that prompt — and everything contextually inferred from it — passes through servers governed by US law, subject to the CLOUD Act regardless of contractual data-processing agreements.

The EU AI Act, fully enforceable from August 2026 with fines up to €35 million or 7% of global turnover, requires enterprises to demonstrate provable, auditable control over what AI systems can access, remember, and act upon. It does not tell them how to achieve this technically. No current enterprise AI vendor provides the technical implementation layer that makes compliance provable.

This is the governance gap. It is structural, not contractual. It has not been solved.

2. The Architecture: BlackVault™

BlackVault™ is a zero-transmission AI memory middleware that separates intelligence from memory. External AI models — Claude, GPT-4, Gemini — receive only the minimum context required to perform a task. All corporate data, all persistent memory, all organisational knowledge remains inside enterprise infrastructure. The model never sees the vault.

- **Zero-transmission:** corporate data never leaves customer infrastructure
- **Auditable:** every memory access is logged, governed, and constrained
- **Model-agnostic:** works across all major AI platforms simultaneously
- **EU AI Act compliant by design** — not by contractual assertion

The 1,250-page technical specification has been independently assessed as enterprise-grade. More significantly, in early 2026 a researcher at Bosch R&D; in Sweden — Mihai Ciprian Chezan, working independently of his employer — published two research papers using the identical "Constitutional Memory" name and architectural principles, without any coordination with this project. A second independent paper by researcher Li Zhenghui appeared on arXiv in March 2026. Independent convergence of this kind on the same architecture from entirely separate directions is rare and represents the strongest form of third-party validation available at this stage.

3. The Commercial Structure: A SWIFT for AI Governance

Constitutional Memory is not seeking venture capital. The proposition is a European AI-Governance Alliance — a consortium of 8 to 12 major European enterprises who would collectively own and deploy the governance framework, modelled explicitly on the SWIFT banking communication network.

The SWIFT analogy is precise: shared, neutral, industry-owned infrastructure that no single participant controls and no external acquirer can capture. The Alliance would establish an interoperable AI governance standard across European enterprise, creating a sovereign alternative to US-owned AI infrastructure at the architecture layer.

A small number of major European technology and infrastructure organisations are under active approach for founding partner roles. Paul Hermelin, Chairman of Capgemini, has engaged with the proposition. Senior executives at Telefónica and Indra — Spain's two largest technology infrastructure companies, both of which have declared sovereign AI as a strategic priority — are in active outreach. The objective is to confirm a founding Sovereign AI Infrastructure Partner by Q3 2026.

4. The Geography: Málaga as Constitutional Valley

The project is anchored in Málaga, Spain — home to one of Europe's densest cybersecurity clusters at Málaga TechPark, designated a national strategic node by the National Cybersecurity Institute. Google, Vodafone, Capgemini, and Indra have all established significant operations there. BytePeaks — the Barcelona-based fractional CTO team that helped scale Freepik to a €1 billion valuation — is the technical development partner.

"Constitutional Valley" is proposed as a European answer to Silicon Valley: built on the principle of data sovereignty rather than data extraction, anchored in Spanish soil, and governed by the enterprises that depend on it.

5. The Regulatory Moment

The EU AI Act is the most significant technology regulation in a generation. August 2026 is the effective enforcement date for the highest-risk AI system obligations. Regulation creates obligations without providing tools. The compliance infrastructure layer — the technical implementation that makes AI Act obligations provable — does not yet exist at scale in the European market.

The question this project raises is not whether AI governance infrastructure is needed. It is whether that infrastructure will be European-owned when it arrives.

About the Architect

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