**CROHN'S &
COLITIS UK**

Use of Generative AI and Personal Data Statement
May 2024

Full Statement

Artificial Intelligence that is powered by Large Language Models (LLM) should not be used in any way that may harm the charity. AI Generators (e.g. ChatGPT) learn from data, so employees and volunteers should be aware of the data they provide to any AI. It is not permitted to use this type of AI for confidential matters or the processing of personal sensitive data, or to allow contractors processing data on our behalf to do so. This includes commercially sensitive information, supporter data such as names and contact details, and the identifiable health data of our community.

Background

The use of AI in the workplace has increased rapidly over the past two years. AI chat bots such as ChatGPT have become accessible to users with very little technical expertise. The number of news articles about the use of AI grows daily – from AI written TV scripts to musicians donating their voices to generate new AI created content.

Chatbots such as ChatGPT are trained on very large datasets, including text drawn from the internet and information entered by users.

ChatGPT's terms of use state that the user will be considered the controller of data entered and, therefore, responsible for all the obligations of a controller. This includes demonstrating accountability and informing data subjects of how their personal data will be used.

The outcome of entering personal/sensitive data into a Chatbot is that this data may appear in the results of other users' sessions with the bot as the AI is essentially learning from the data being entered.

This would be against the principles of GDPR as we would not have informed supporters that we are using their data in this way. There is also the reputational risk associated with sensitive and personal data from our charity appearing in sessions.

It is worth noting that it was reported that Microsoft itself has advised its employees not to submit questions containing sensitive information or personal data into ChatGPT.

Scope

This statement encompasses:
- personal data created by or on behalf of the Charity and staff in their duties for the Charity
- data received by any member of staff or volunteer in the Charity
- commercially sensitive. Intellectual property and information for internal use only

This statement applies to all staff, volunteers and contractors of the Charity, and all partners who process data that is controlled by the Charity.