

Artificial Intelligence (AI) Usage Policy

Independent Insurance Brokerage

Version 1.0 | Effective Date: _____ | Next Review: _____

Policy Statement

This policy governs the use of Artificial Intelligence (AI) tools within our brokerage. It is designed to ensure compliance with the General Data Protection Regulation (GDPR), the Central Bank of Ireland (CBI) Consumer Protection Code, and our professional obligations as a regulated insurance intermediary.

1. Purpose & Scope

This policy applies to all principals, employees, and contractors of the brokerage who use AI tools in the course of their work. It covers all AI platforms including but not limited to large language models (e.g. Claude, ChatGPT), AI writing assistants, and automated data processing tools.

1.1 Objectives

- Protect the personal data of clients in line with GDPR obligations
- Maintain compliance with the Central Bank of Ireland regulatory framework
- Preserve client confidentiality and professional trust
- Enable staff to use AI tools effectively and responsibly
- Establish clear accountability for AI-assisted outputs

2. Regulatory & Legal Context

As a regulated insurance intermediary authorised by the Central Bank of Ireland, this brokerage operates under the following key frameworks:

Framework	Relevance to AI Use
GDPR (2018)	Any upload of client personal data to an AI platform constitutes a data transfer. Requires lawful basis, data minimisation, and may require a Data Processing Agreement (DPA).
CBI Consumer Protection Code	Requires that client information is handled with care and confidentiality. AI outputs used in client advice must be reviewed and owned by a qualified person.

Fitness & Probity / PCF Obligations	Principals retain responsibility for all advice and outputs. AI does not diminish personal accountability under the Fitness & Probity regime.
Professional Indemnity Insurance	Check whether your PI policy covers AI-assisted work. Some insurers may have exclusions or conditions relating to AI tool usage.
Data Protection Acts 1988-2018	Supplements GDPR in Ireland. The Data Protection Commission (DPC) is the supervisory authority.

3. Approved & Prohibited Uses

3.1 Permitted Uses

The following uses of AI tools are permitted subject to the conditions set out in Section 4:

- Drafting client correspondence, cover letters, and renewal communications (using anonymised or fictional data)
- Summarising policy wordings and coverage comparisons
- Preparing internal reports, templates, and business documents
- Research into market trends, regulatory updates, and product information
- Supporting study and professional development (CIP, MDI, LIA qualifications)
- Creating operational tools such as trackers, calculators, and workflow templates

3.2 Prohibited Uses

The following uses are strictly prohibited:

- Uploading any document containing real client personal data (names, addresses, PPS numbers, policy numbers, financial details) to any AI platform without explicit written consent and a valid DPA in place
- Relying solely on AI-generated advice without qualified human review before presenting to clients
- Using AI tools to generate or alter claims documentation
- Using AI to make automated decisions about client eligibility or coverage without human oversight
- Sharing client data with AI platforms that do not have GDPR-compliant terms and an EU Standard Contractual Clause (SCC) or adequacy decision in place

4. Data Handling Requirements

4.1 Anonymisation Before Upload

Before uploading any client-related content to an AI tool, staff must anonymise all personal data. This means:

- Replace client names with generic references (e.g. 'Client A')
- Remove policy numbers, PPS numbers, dates of birth, and addresses
- Replace specific financial figures where not essential to the task
- Do not include insurer account numbers or login credentials

4.2 Data Processing Agreements

Before using any AI platform for business purposes, the practice principal must confirm:

- The platform provider has GDPR-compliant terms of service
- A Data Processing Agreement (DPA) is in place where the provider acts as a data processor
- Data is not used to train models without explicit opt-out (check platform privacy settings)
- Data is stored within the EEA or subject to adequate transfer safeguards

5. Quality Control & Human Oversight

All AI-generated content used in a client-facing or regulatory context must be reviewed and approved by a qualified staff member before use. The reviewing person must:

- Verify factual accuracy against source documents
- Ensure all advice complies with the Consumer Protection Code
- Confirm the output reflects the specific needs and circumstances of the client
- Take professional responsibility for any advice or recommendation provided

AI tools are to be used as assistants to qualified professionals, not as replacements for professional judgement.

6. Approved AI Tools

Only the following AI tools are approved for use in this brokerage. Use of any other AI platform requires prior approval from the principal:

Tool	Permitted Use	Data Restriction
Claude (Anthropic)	Drafting, research, templates, summaries	Anonymised data only
[Add Tool Name]	[Define permitted use]	[Define restriction]
[Add Tool Name]	[Define permitted use]	[Define restriction]

7. Incident Reporting

If a staff member believes that client personal data has been accidentally shared with an AI platform, they must:

- Immediately inform the practice principal or Data Protection Officer (DPO)
- Document the incident including date, platform, data involved, and circumstances
- Assess whether the incident constitutes a personal data breach under GDPR
- Where a breach has occurred, notify the Data Protection Commission (DPC) within 72 hours if required

- Notify affected clients where there is a high risk to their rights and freedoms

8. Training & Awareness

All staff using AI tools must complete an initial briefing on this policy before use. The practice principal is responsible for ensuring:

- All staff are made aware of this policy upon joining and when it is updated
- Annual refresher training is provided covering any changes to AI tools or regulatory guidance
- Staff are encouraged to raise concerns or queries about AI usage with the principal

9. Policy Review

This policy will be reviewed annually or following any material change in:

- Applicable legislation or CBI regulatory guidance
- The AI tools used by the brokerage
- Guidance issued by the Data Protection Commission
- Any data breach or incident involving AI tools

10. Acknowledgement & Sign-Off

Principal Name: _____	Signature: _____
Date: _____	Next Review Date: _____

This policy is an internal document. It should be retained in your compliance files and made available for inspection by the Central Bank of Ireland upon request.