# **GENERIS GLOBAL**

## **AI Agent Policy**

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#### 1. INTRODUCTION

Generis Global operates as a *Swiss Verein*, serving as the umbrella organization for a network of independent firms across jurisdictions. This unique structure enables Generis Global to provide a seamless range of legal, professional, and advisory services, while allowing member firms to maintain operational autonomy. With its innovative use of artificial intelligence (AI), Generis Global integrates cutting-edge technology into its platforms to enhance client interactions, streamline workflows, and drive operational efficiency.

The AI Agent Policy underscores Generis Global's commitment to transparency, ethical practices, and compliance with global standards. This policy serves as a foundational document to ensure consistent governance of AI systems across all platforms and services associated with Generis Global.

#### **PURPOSE OF THE POLICY**

The purpose of this policy is to:

- 1. Establish a comprehensive framework governing the deployment and use of AI agents across Generis Global's operations.
- 2. Provide clarity on the roles, limitations, and scope of AI agents.
- 3. Address data privacy, ethical considerations, and user consent in interactions with AI systems.
- 4. Maintain operational security by providing a broad yet legally enforceable applicability of the policy without compromising sensitive details.
- 5. Reassure clients, partners, and stakeholders of Generis Global's dedication to ethical AI usage and compliance with regulatory frameworks.

#### SIGNIFICANCE OF THE POLICY

- 1. **Enhancing Trust**: By clearly defining how AI agents operate, this policy aims to build trust with users who engage with Generis Global's platforms.
- 2. **Ensuring Accountability**: It provides a structured approach to the ethical and legal use of AI, holding Generis Global accountable for its implementation.
- **3**. **Future-Proofing**: Recognizing the rapid evolution of AI technology, this policy is designed to adapt to future advancements while maintaining a consistent standard.

#### **GENERIS GLOBAL'S AI VISION**

Generis Global envisions AI as a transformative tool to elevate service delivery across its platforms. By leveraging AI agents with human-like identities, the organization enhances client experiences while ensuring operational scalability. These agents are governed by rigorous ethical and quality standards to align with Generis Global's core values of professionalism, integrity, and innovation.

#### 2. SCOPE OF THE POLICY

#### **APPLICABILITY**

This policy applies universally across all platforms, services, and operations owned, managed, or controlled by Generis Global, either directly or indirectly. It encompasses:

- 1. Websites, blogs, applications, and digital tools operated under Generis Global's governance.
- 2. AI-driven systems used for client interactions, including chatbots, virtual assistants, and workflow automation tools.

3. Member firms and entities operating autonomously under the Generis Global umbrella but leveraging its AI-driven infrastructure.

By defining this broad applicability, Generis Global ensures that the policy governs every instance of AI agent deployment within its ecosystem while maintaining operational consistency and compliance across diverse jurisdictions.

#### **INCLUSION OF ASSOCIATED ENTITIES**

- 1. **Member Firms**: Member firms under Generis Global's Swiss Verein structure are autonomous but subject to the overarching guidelines set forth in this policy when using AI-driven tools and systems provided by Generis Global.
- 2. **Affiliated Platforms**: The policy extends to platforms affiliated with Generis Global, including those indirectly managed or partially controlled by its subsidiaries, associates, or partners.
- 3. **Unspecified Properties**: For operational security, this policy does not disclose specific platform names but uniformly governs all Generis Global-related properties to ensure compliance and mitigate risk.

#### GEOGRAPHICAL SCOPE

Generis Global operates globally, with this policy tailored to meet the legal, regulatory, and ethical standards of multiple jurisdictions, including:

- 1. **Europe**: Compliant with GDPR and local privacy laws.
- 2. United States: Adhering to CCPA, HIPAA (where applicable), and industry-specific standards.
- 3. **Asia-Pacific and Other Regions**: Aligning with local AI and data protection regulations, ensuring adherence to global best practices.

#### **USER ENGAGEMENT**

- 1. Clients and End-Users: The policy governs all interactions facilitated by AI agents on Generis Global's platforms, whether clients or end-users initiate them.
- 2. **Internal Staff and Contractors**: Generis Global employees, contractors, and associates utilizing AI tools must adhere to the operational and ethical guidelines set forth in this policy.

#### **OPERATIONAL SECURITY CLAUSE**

Generis Global does not explicitly identify the platforms, services, or applications governed by this policy. This deliberate omission ensures operational security and strategic confidentiality while maintaining a legally enforceable framework applicable to all Generis Global properties.

#### 3. TRANSPARENCY IN AI USAGE

#### ROLE OF AI AGENTS IN GENERIS GLOBAL'S OPERATIONS

Generis Global deploys AI agents across its platforms and services to enhance operational efficiency, client interactions, and workflow automation. These agents are programmed to perform various tasks, including but not limited to:

- 1. Handling client queries via chat interfaces.
- 2. Assisting in scheduling, document preparation, and task management.
- 3. Responding to emails with structured and professional content.
- 4. Supporting member firms in managing routine communications and administrative workflows.

These AI agents are designed to provide a seamless user experience, simulating human-like interactions where appropriate.

#### DISCLOSURE OF AI INVOLVEMENT

- 1) **Identification of AI Agents:** Generis Global ensures that users interacting with AI agents are made aware of their non-human nature. Notifications such as "This response is generated by an AI agent" may be incorporated where applicable.
- 2) **Distinct Identities:** AI agents operating under Generis Global may use distinct identities for better user engagement. These identities are governed by strict ethical guidelines and are not intended to mislead users into believing they are interacting with humans.
- 3) Transparency Mechanisms: Generis Global platforms will incorporate transparency features, including:
  - a) Clear labeling of AI-driven processes.
  - b) Disclosure of tasks that are fully or partially automated.
  - c) Availability of escalation to human representatives when necessary.

#### CONTEXTUAL ADAPTATION OF AITRANSPARENCY

Generis Global recognizes that while transparency is essential, there are situations where full real-time disclosure of AI involvement may not align with the goals of user experience or operational efficiency. To address this, Generis Global adopts a balanced approach, ensuring both transparency and practicality:

1. **Routine or Low-Sensitivity Interactions:** In tasks where AI involvement is auxiliary (e.g., system-generated reminders, automated scheduling), explicit real-time notification may not be provided. This aligns with the broad consent users provide during onboarding.

- 2. **Post-Interaction Clarity:** Users retain the right to inquire about the involvement of AI after the interaction. Generis Global commits to providing clear answers upon request.
- 3. **Transparency Through Policy:** The use of AI across Generis Global's platforms is disclosed comprehensively through this policy, privacy statements, and terms of service, ensuring users are informed even in contexts without real-time notifications.

Generis Global reaffirms its ethical commitment by:

- 1. Offering human support escalation in all interactions.
- 2. Avoiding deceptive practices or misrepresentation of AI involvement.
- 3. Continuously reviewing and improving transparency mechanisms based on user feedback.

#### PURPOSE OF TRANSPARENCY

Transparency in AI usage serves several critical functions:

- 1. **Building Trust:** By informing users about AI involvement, Generis Global fosters trust and confidence in its operations.
- 2. **Ensuring Ethical Compliance:** Transparency mitigates ethical concerns about deception or misrepresentation in AI interactions.
- 3. **Supporting User Awareness:** Users are empowered to make informed decisions when engaging with AI-driven systems.

#### COMMITMENT TO ACCOUNTABILITY

1. **Monitoring AI Behavior:** All AI agents deployed by Generis Global are regularly monitored for accuracy, fairness, and compliance with operational guidelines.

2. **Feedback Mechanisms:** Generis Global encourages users to provide feedback on AI interactions, ensuring continuous improvement and accountability.

#### OPERATIONAL SECURITY IN TRANSPARENCY

While Generis Global is committed to transparency, specific details regarding the AI systems' internal operations, proprietary algorithms, and platform-specific deployments are not disclosed to safeguard operational security.

#### 4. DATA COLLECTION AND PRIVACY

### **OVERVIEW OF DATA COLLECTION BY AI AGENTS**

Generis Global is committed to collecting and handling data responsibly and in compliance with applicable data protection laws. AI agents operating across Generis Global's platforms collect data to:

- 1. Enhance user interactions and provide tailored responses.
- 2. Automate routine processes and optimize workflow efficiency.
- 3. Generate insights for improving service quality.

#### 4. DATA COLLECTION AND PRIVACY

#### OVERVIEW OF DATA COLLECTION BY AI AGENTS

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1. Enhance user interactions and provide tailored responses.

- 2. Automate routine processes and optimize workflow efficiency.
- 3. Generate insights for improving service quality.

#### TYPES OF DATA COLLECTED

All agents may collect the following categories of data, depending on the nature of the interaction:

### 1) Personally Identifiable Information (PII):

a) Examples: Name, email address, phone number, and other contact details.

### 2) Interaction Data:

a) Examples: Chat transcripts, email interactions, and user queries.

### 3) Behavioral Data:

a) Examples: Time spent on platforms, frequently asked questions, and user preferences.

### 4) Transactional Data:

 a) Examples: Billing information, payment confirmations, and service requests.

### 5) Metadata:

a) Examples: IP addresses, device types, browser information, and geographic locations.

#### PURPOSE OF DATA COLLECTION

The data collected by Generis Global's AI agents is used solely for legitimate business purposes, including:

- 1. Improving the accuracy and relevance of AI-generated responses.
- 2. Facilitating efficient client service and communication.

- 3. Conducting quality assurance and system optimization.
- 4. Ensuring compliance with legal and regulatory requirements.

### DATA STORAGE AND SECURITY

### 1) Data Storage Protocols:

- a) Data is stored securely in compliance with global regulations, such as GDPR and CCPA.
- b) Generis Global employs robust encryption methods to protect sensitive information.

### 2) Access Control:

a) Data access is restricted to authorized personnel only, with clear protocols to prevent unauthorized access.

### 3) Retention Policies:

a) Data is retained only as long as necessary to fulfill the purposes outlined above or as required by law.

#### DATA SHARING AND THIRD-PARTY INVOLVEMENT

#### 1) Internal Use:

a) Data is primarily used within Generis Global's ecosystem to enhance services.

#### 2) Third-Party Vendors:

a) Where necessary, data may be shared with third-party vendors for purposes such as payment processing or technical support. These vendors are bound by strict confidentiality and compliance agreements.

### 3) No Unauthorized Sharing:

a) Generis Global does not sell or share user data with external parties for marketing or other unauthorized purposes.

### **USER RIGHTS AND CONSENT**

Generis Global respects the rights of its users under applicable data protection laws, including:

- 1. **Right to Access:** Users can request a copy of the data collected about them.
- 2. **Right to Correction:** Users may request corrections to inaccurate or incomplete data.
- 3. **Right to Deletion:** Users can request the deletion of their data, subject to legal and operational requirements.
- **4. Consent Management:** Users are informed about data collection practices and must provide explicit consent before engaging with AI-driven systems.

#### OPERATIONAL SECURITY IN DATA MANAGEMENT

Generis Global ensures operational security by not disclosing platform-specific data handling practices to external parties. However, the organization adheres to industry standards to maintain confidentiality and integrity in all data management processes.

#### 5. ETHICAL STANDARDS

#### COMMITMENT TO ETHICAL AI DEPLOYMENT

Generis Global is committed to maintaining the highest ethical standards in the deployment and use of AI agents across its platforms and services. Recognizing the potential impact of AI on client trust, privacy, and fairness, Generis Global ensures that all AI systems adhere to principles of integrity, accountability, and transparency.

#### **KEY ETHICAL PRINCIPLES**

### 1) Fairness and Non-Discrimination:

- a) AI agents are designed and monitored to avoid biases related to gender, race, ethnicity, religion, or any other protected characteristic.
- b) Generis Global employs advanced algorithms and regular audits to identify and mitigate any potential biases.

### 2) Transparency:

- a) Users are informed when interacting with AI agents, ensuring there is no confusion about the non-human nature of responses.
- b) The functionality, limitations, and scope of AI agents are disclosed as outlined in this policy.

### 3) Accuracy and Reliability:

- a) AI agents are continuously monitored to ensure that the information provided is accurate and relevant.
- b) Regular updates and quality checks are performed to enhance the reliability of AI responses.

### 4) Accountability:

- a) Generis Global takes responsibility for the actions and outputs of its AI agents, ensuring that errors or inaccuracies are addressed promptly.
- b) An escalation process is in place for cases requiring human intervention.

### 5) Respect for User Autonomy:

a) Users have the right to choose whether to engage with AI agents and can request human assistance at any point in the interaction.

#### ETHICAL OVERSIGHT MECHANISMS

### 1) AI Development and Deployment:

a) All AI systems are developed and deployed following a rigorous review process to ensure compliance with ethical guidelines.

### 2) Continuous Monitoring and Feedback:

a) AI agents undergo continuous performance monitoring to identify and address any ethical concerns.

### 3) Training and Awareness:

a) Employees and contractors working with AI systems are trained to understand ethical considerations and uphold these standards in their roles.

#### PROHIBITED PRACTICES

Generis Global strictly prohibits the following practices in its use of AI agents:

- 1. **Deceptive Interactions:** AI agents will not be used to mislead users into believing they are interacting with human representatives.
- 2. **Data Exploitation:** AI systems will not be used to exploit user data for purposes outside the scope of this policy.
- 3. **Unethical Decision-Making:** AI agents will not be programmed or utilized to make decisions that unfairly disadvantage or harm individuals or groups.

#### **OPERATIONAL SECURITY AND ETHICS**

Generis Global recognizes the importance of operational security in maintaining ethical standards. While specific details about AI training datasets and proprietary algorithms are not disclosed, all systems comply with industry-best ethical practices to safeguard the integrity of Generis Global's operations.

#### 6. LIMITATIONS AND DISCLAIMERS

### SCOPE AND BOUNDARIES OF AI AGENTS

While AI agents deployed by Generis Global are designed to enhance operational efficiency and improve client interactions, their capabilities are subject to inherent limitations. This section defines the boundaries of reliance on AI-generated outputs and establishes disclaimers to protect both Generis Global and its users.

#### LIMITATIONS OF AI AGENTS

### 1) Non-Human Nature:

- a) AI agents are not human and cannot replicate human judgment, intuition, or empathy.
- b) While they simulate human-like interactions, they operate strictly within predefined algorithms and data sets.

### 2) No Legal Advice:

- a) AI agents do not provide legal advice or replace professional judgment from licensed attorneys.
- b) Responses generated by AI agents are informational and procedural, not a substitute for case-specific legal counsel.

### 3) Accuracy and Contextual Limitations:

- a) AI-generated responses are based on available data and programmed rules. They may not fully account for unique or complex circumstances.
- b) Generis Global ensures continuous updates to improve accuracy but does not guarantee error-free outputs in all scenarios.

### 4) Reliance on User Input:

- a) The quality of AI-generated responses depends on the accuracy and clarity of the user's input.
- b) Misinterpretations or incomplete data may result in less precise outputs.

### 5) Jurisdictional Variability:

a) AI agents operate globally but may not account for jurisdiction-specific nuances or legal frameworks in every interaction.

#### **DISCLAIMERS**

### 1) Informational Use Only:

- a) AI responses are for informational purposes and do not constitute legal, financial, or professional advice.
- b) Users are encouraged to consult licensed professionals for critical or high-stakes matters.

### 2) Liability Limitation:

- a) Generis Global is not liable for actions taken based on AI-generated responses.
- b) Users assume full responsibility for interpreting and applying information provided by AI agents.

### 3) No Warranty:

- a) Generis Global makes no warranties regarding the accuracy, completeness, or suitability of AI-generated content for specific purposes.
- b) The organization disclaims liability for any errors, omissions, or outcomes resulting from AI interactions.

### 4) Escalation to Human Oversight:

a) For complex or sensitive matters, users are encouraged to seek human assistance through Generis Global's designated channels.

#### **USER ACKNOWLEDGMENT**

By engaging with Generis Global's AI-driven platforms, users acknowledge and agree to the limitations and disclaimers outlined in this policy. This acknowledgment forms part of the terms and conditions governing the use of Generis Global's services.

#### **OPERATIONAL SECURITY IN LIMITATIONS**

Generis Global ensures that specific operational constraints and technical details regarding AI systems remain undisclosed to protect proprietary methodologies and maintain strategic confidentiality. These undisclosed details do not compromise the enforceability of this policy.

#### 7. HUMAN OVERSIGHT AND INTERVENTION

#### **ROLE OF HUMAN OVERSIGHT**

While AI agents deployed by Generis Global provide significant efficiencies and enhance user experiences, human oversight remains an integral part of the organization's commitment to delivering high-quality and reliable services. This section outlines the role of human intervention in monitoring, supporting, and enhancing AI-driven interactions.

### WHEN HUMAN OVERSIGHT IS REQUIRED

### 1) Complex or Sensitive Matters:

- a) AI agents are not equipped to handle highly complex legal or sensitive client issues requiring nuanced professional judgment.
- b) Such matters are automatically flagged for human intervention.

### 2) Escalation Requests:

a) Users may request to escalate their interactions to human representatives at any time during their engagement with AI agents.

### 3) Error or Anomaly Detection:

a) Instances of errors, inaccuracies, or anomalies in AI-generated responses are promptly reviewed and corrected by human personnel.

### 4) Legal and Regulatory Compliance:

 a) Human oversight ensures that all AI interactions comply with jurisdiction-specific laws, professional standards, and organizational policies.

#### PROCESSES FOR HUMAN INTERVENTION

### 1) Real-Time Escalation:

a) Platforms governed by Generis Global provide users with accessible options to escalate issues to human representatives through chat interfaces, email, or phone.

### 2) Post-Interaction Review:

a) AI-generated responses in sensitive or high-priority cases undergo post-interaction review by human staff to ensure quality and compliance.

#### 3) Error Resolution:

a) Dedicated teams address user complaints or concerns about AI responses, ensuring timely resolution and feedback integration.

#### **BENEFITS OF HUMAN OVERSIGHT**

#### 1) Quality Assurance:

a) Regular human review enhances the accuracy, relevance, and reliability of AI-generated outputs.

### 2) Trust Building:

a) Providing users with a clear pathway to human support fosters trust and confidence in Generis Global's services.

### 3) Ethical Safeguards:

a) Human intervention acts as a safeguard against potential ethical lapses or biases in AI responses.

#### OPERATIONAL SECURITY IN HUMAN OVERSIGHT

To maintain operational security and protect sensitive information, the processes and protocols for human oversight are internally documented and not disclosed to external parties. Generis Global ensures that all human intervention measures align with its strategic confidentiality goals while upholding service quality and user satisfaction.

### USER AUTONOMY IN REQUESTING HUMAN SUPPORT

Generis Global recognizes the importance of user autonomy and ensures that users have the freedom to:

- 1. Opt out of AI-driven interactions in favor of human assistance.
- 2. Escalate their concerns directly to human representatives through clearly defined channels.

#### 8. MONITORING AND IMPROVEMENT OF AI AGENTS

#### COMMITMENT TO CONTINUOUS IMPROVEMENT

Generis Global is committed to maintaining high standards of accuracy, reliability, and ethical compliance in the operation of its AI agents. To achieve this, Generis Global employs robust monitoring mechanisms and adopts a proactive approach to improving its AI systems based on feedback, performance analysis, and technological advancements.

#### MONITORING MECHANISMS

### 1) Real-Time Monitoring:

- a) AI agents are equipped with real-time monitoring capabilities to track their interactions, responses, and decision-making processes.
- b) Alerts and flags are generated for any deviations from predefined parameters, such as errors, irrelevant outputs, or user complaints.

### 2) Performance Audits:

a) Periodic audits are conducted to evaluate the performance of AI systems against key metrics, including response accuracy, user satisfaction, and compliance with ethical and legal standards.

#### 3) Error Detection and Resolution:

a) Dedicated teams review flagged interactions to identify errors or inaccuracies and implement corrective measures.

### 4) Usage Analytics:

a) Generis Global leverages analytics to understand user behavior, preferences, and engagement patterns with AI systems. This data informs updates and refinements to improve overall system performance.

#### **IMPROVEMENT STRATEGIES**

### 1) User Feedback Integration:

- a) Feedback from users interacting with AI agents is systematically collected, analyzed, and incorporated into system updates.
- b) Feedback loops ensure that user concerns and suggestions are addressed promptly.

### 2) Algorithm Updates:

- a) AI algorithms are regularly updated to enhance their ability to interpret and respond to user queries accurately.
- b) Updates include refining language models, incorporating jurisdiction-specific legal knowledge, and improving contextual understanding.

### 3) Training on Diverse Data Sets:

a) AI systems are trained using diverse and representative data sets to minimize biases and improve the quality of responses across different use cases and regions.

### 4) Compliance with Industry Standards:

a) Generis Global actively monitors changes in industry standards, best practices, and regulatory requirements to ensure that its AI systems remain compliant and up-to-date.

#### 9. LEGAL AND REGULATORY COMPLIANCE

#### COMMITMENT TO COMPLIANCE

Generis Global adheres to all applicable laws, regulations, and professional standards governing the use of AI systems, data privacy, and client interactions. This commitment ensures that AI agents and associated processes align with the diverse regulatory frameworks of the jurisdictions in which Generis Global operates.

#### KEY REGULATIONS AND FRAMEWORKS

Generis Global ensures compliance with the following regulatory frameworks and industry standards, among others:

#### 1) Global Data Protection Laws:

### a) General Data Protection Regulation (GDPR) (European Union):

- i) Adherence to data collection, storage, and processing requirements.
- ii) Ensuring user rights to access, correct, or delete their data.

### b) California Consumer Privacy Act (CCPA) (United States):

i) Transparency in data usage and enabling users to opt out of data sharing.

### c) Other Regional Data Protection Laws:

i) Compliance with jurisdiction-specific privacy regulations, including those in Asia-Pacific, the Middle East, and other regions.

### 2) Legal Practice Standards:

- a) AI agents do not provide legal advice, ensuring compliance with professional regulations that govern the unauthorized practice of law.
- b) Systems are designed to complement human legal expertise without infringing on jurisdictional licensing requirements.

### 3) AI Ethics and Accountability:

a) Generis Global complies with industry best practices for ethical AI use, including transparency, fairness, and bias mitigation, as recommended by leading AI governance bodies.

### 4) Healthcare Regulations (if applicable):

a) Compliance with HIPAA (Health Insurance Portability and Accountability Act) for AI-driven interactions involving healthcare-related data.

### 5) Industry-Specific Standards:

a) Adherence to regulatory requirements specific to the legal, financial, and other industries served by Generis Global.

#### INTERNAL COMPLIANCE MEASURES

### 1) Policy Reviews:

a) Generis Global regularly reviews and updates its internal policies to reflect changes in global regulations and emerging legal standards.

### 2) Compliance Training:

a) Employees, contractors, and member firms receive training on compliance requirements, ensuring that they understand and uphold relevant laws and standards in their use of AI systems.

### 3) Audits and Reporting:

- a) Routine audits are conducted to ensure compliance with all regulatory frameworks.
- b) Generis Global maintains detailed records of AI interactions and processes to facilitate reporting and accountability.

#### **CROSS-BORDER DATA HANDLING**

### 1) Data Localization:

a) Where required by local regulations, Generis Global ensures that data is stored within the jurisdiction of its origin.

### 2) Data Transfers:

a) International data transfers are conducted in compliance with applicable laws, such as GDPR's Standard Contractual Clauses (SCCs) or equivalent frameworks.

#### OPERATIONAL SECURITY IN COMPLIANCE

While specific compliance protocols and internal processes are not disclosed to external parties for security reasons, Generis Global ensures full adherence to legal and regulatory

requirements. The organization's compliance measures are designed to balance transparency with operational confidentiality.

#### **USER ASSURANCE**

Generis Global is committed to informing users about its compliance practices through:

- 1) Transparent disclosures in this policy and related documentation.
- 2) Dedicated channels for addressing compliance-related queries or concerns.

#### 10. USER CONSENT AND AWARENESS

#### INFORMED USER ENGAGEMENT

Generis Global prioritizes user consent and awareness in all interactions facilitated by AI agents. This ensures that users are fully informed about the nature of their interactions and their rights regarding data collection, usage, and AI involvement. By implementing robust consent mechanisms, Generis Global aligns its practices with global privacy regulations and ethical standards.

#### **CONSENT MECHANISMS**

#### 1) Explicit Consent:

- a) Users interacting with Generis Global's platforms are required to explicitly agree to the terms outlined in this policy before engaging with AI agents.
- b) Consent may be collected through methods such as:
  - i) Click-through agreements on websites and platforms.
  - ii) Verbal acknowledgment during calls facilitated by AI agents.
  - iii) Acceptance of terms during account registration or service onboarding.

### 2) Granular Consent Options:

- a) Users are provided with the ability to consent separately to:
  - i) AI-driven interactions.
  - ii) Data collection and usage for specific purposes (e.g., improving services or receiving targeted communications).
- b) Users may opt out of non-essential data collection while continuing to use Generis Global's services.

### 3) Implied Consent for Certain Interactions:

a) For routine or non-sensitive interactions, implied consent may be assumed where users voluntarily engage with AI agents, provided this practice complies with applicable laws.

#### **USER AWARENESS**

### 1) Disclosure of AI Involvement:

- a) Generis Global ensures that users are notified when interacting with AI agents, with clear labeling and messaging such as:
  - i) "This response is generated by an AI agent."
- b) Notifications also inform users about the scope and limitations of AI responses.

### 2) Transparency About Data Collection:

a) Users are informed about the types of data collected, the purposes of data processing, and their rights under this policy and applicable regulations.

### 3) Access to Policy Documentation:

a) The AI Agent Policy is publicly available on Generis Global's platforms, ensuring users can review the terms governing their interactions.

#### 4) Educational Resources:

a) Generis Global provides educational content explaining the role of AI agents, how they operate, and the measures in place to protect user privacy and data.

### **USER RIGHTS AND CONTROLS**

### 1) Right to Withdraw Consent:

- a) Users can withdraw their consent for AI-driven interactions or data collection at any time through clear and accessible mechanisms.
- b) Upon withdrawal, users are offered alternatives such as engaging with human representatives.

### 2) Right to Data Access and Portability:

a) Users can request access to the data collected during their interactions and may also request that their data be transferred to another service provider where applicable.

### 3) Right to Opt-Out:

a) Users have the right to opt out of AI interactions entirely and request human assistance instead.

#### **OPERATIONAL SECURITY AND CONSENT**

To maintain operational security, Generis Global does not disclose the exact technical mechanisms used to collect and manage user consent. However, all processes are designed to comply with industry standards and ensure user trust.

#### PERIODIC UPDATES AND REAFFIRMATION

### 1) Policy Updates:

a) Users are notified of significant updates to the AI Agent Policy and are required to reaffirm their consent when material changes occur.

### 2) Periodic Reminders:

a) Periodic reminders about user rights and consent preferences are issued to ensure continued alignment with user expectations.

#### 11. COMPLAINT AND REDRESS MECHANISM

#### COMMITMENT TO ADDRESSING USER CONCERNS

Generis Global is committed to providing users with an efficient and transparent mechanism to raise concerns, report issues, and seek resolutions related to AI-driven interactions. This complaint and redress mechanism ensures that all grievances are handled promptly and fairly, reinforcing user trust and satisfaction.

#### **SCOPE OF COMPLAINTS**

Users can lodge complaints related to the following areas:

### 1) AI Interactions:

- a) Errors or inaccuracies in AI-generated responses.
- b) Misinterpretations of user inputs.

### 2) Data Privacy:

a) Concerns about data collection, storage, or sharing practices.

### 3) Consent and Transparency:

a) Issues regarding lack of notification or improper handling of consent.

### 4) Service Experience:

a) Dissatisfaction with the quality or relevance of AI-driven services.

#### **COMPLAINT RESOLUTION PROCESS**

### 1) Submission of Complaints:

- a) Users can submit complaints through multiple channels, such as:
  - i) **Email:** A dedicated email address (e.g., complaints@generisglobal.com).
  - ii) **Online Forms:** Secure complaint submission forms available on Generis Global platforms.
  - iii) **Telephone:** A toll-free number for immediate assistance.

### 2) Acknowledgment:

a) Upon receipt of a complaint, Generis Global issues an acknowledgment within 24 hours, confirming that the issue is under review.

### 3) Investigation:

- a) Complaints are reviewed by a dedicated team of specialists, including:
  - i) Technical teams for AI-related concerns.
  - ii) Data protection officers for privacy issues.
  - iii) Client support teams for service-related complaints.

### 4) Resolution:

- a) A resolution is provided within a specified timeframe (e.g., 7–14 business days), depending on the complexity of the issue.
- b) Users are informed of the steps taken to resolve the issue, along with any corrective measures implemented.

#### APPEAL PROCESS

If a user is dissatisfied with the resolution provided, they can escalate the matter through an appeals process:

### 1) Second-Level Review:

a) The complaint is reviewed by senior management or an independent grievance committee.

### 2) Final Decision:

a) A final decision is communicated to the user within an additional 7–10 business days.

#### **USER-FRIENDLY FEATURES**

Generis Global ensures that its complaint mechanism is:

- 1. **Accessible:** Multiple submission channels are available to suit user preferences and geographic locations.
- 2. **Transparent:** Users are informed at every stage of the complaint resolution process.
- 3. **Non-Retaliatory:** Users can lodge complaints without fear of retaliation or negative consequences.

#### OPERATIONAL SECURITY IN COMPLAINT HANDLING

Generis Global employs secure systems to handle and process complaints. These systems are designed to protect user information and maintain confidentiality throughout the resolution process. Specific methodologies for complaint handling are not disclosed to safeguard operational integrity.

#### FEEDBACK AND SYSTEM IMPROVEMENTS

### 1) Feedback Integration:

- a) User feedback from complaint resolutions is systematically analyzed to identify areas for improvement.
- b) Patterns or recurring issues are flagged for proactive resolution.

### 2) Policy Updates:

 a) Significant findings from complaints may inform updates to the AI Agent Policy or related processes.

#### 12. UPDATES TO THE POLICY

#### COMMITMENT TO DYNAMIC GOVERNANCE

Generis Global recognizes the evolving nature of AI technology, regulatory frameworks, and user expectations. To ensure continued relevance and compliance, this AI Agent Policy is subject to periodic updates. These updates reflect changes in technology, business practices, legal requirements, and industry standards.

#### **SCOPE OF POLICY UPDATES**

Updates to this policy may include, but are not limited to:

### 1) Technological Advancements:

- a) Integration of new AI capabilities or methodologies.
- b) Refinement of existing AI systems based on technological upgrades.

### 2) Regulatory Changes:

a) Compliance with newly enacted data protection laws or amendments to existing frameworks (e.g., GDPR, CCPA).

### 3) Operational Improvements:

a) Adjustments based on user feedback, complaints, or internal audits.

b) Enhancements to ethical safeguards, consent mechanisms, or monitoring protocols.

### 4) Expansion of Generis Global Services:

a) Inclusion of new platforms, member firms, or service areas under Generis Global's governance.

#### **USER NOTIFICATION**

### 1) Significant Changes:

- a) For material updates that affect user rights, data practices, or the scope of AI interactions, Generis Global will notify users through:
  - i) **Email communication** to registered users.
  - ii) **Prominent notices** on Generis Global's platforms.
  - iii) Updated terms of service or privacy policy prompts.

### 2) Minor Updates:

a) Non-material updates, such as clarifications or formatting changes, will be reflected in the published policy without explicit notifications.

#### EFFECTIVE DATE OF UPDATES

### 1) Implementation Timeline:

a) Policy updates will specify an effective date, providing users with a reasonable period (e.g., 15–30 days) to review the changes.

### 2) User Acknowledgment:

a) Continued use of Generis Global platforms after the effective date constitutes acceptance of the updated policy.

### **USER OPTIONS FOLLOWING UPDATES**

### 1) Acceptance:

a) Users who agree to the updated terms may continue using Generis Global's platforms as usual.

### 2) Opt-Out:

a) Users who do not accept the updates can opt out by ceasing interactions with AI agents or requesting deletion of their data where applicable.

### 3) Queries and Clarifications:

a) Generis Global provides channels for users to seek clarifications about policy updates or express concerns.

#### FEEDBACK ON UPDATES

Generis Global values user input and encourages feedback on policy changes. Suggestions and concerns submitted through feedback channels are considered during future revisions to ensure user-centric governance.

#### **OPERATIONAL SECURITY IN POLICY UPDATES**

While Generis Global ensures full transparency about the implications of policy updates, operational details about internal review processes, decision-making criteria, or specific methodologies are not disclosed to protect strategic interests.

#### 13. CONTACT INFORMATION

#### PURPOSE OF PROVIDING CONTACT INFORMATION

Generis Global ensures that users have clear and accessible channels to address any queries, concerns, or feedback related to the AI Agent Policy. This section outlines the methods through which users can contact Generis Global for assistance.

#### DESIGNATED CONTACT CHANNELS

### 1) Email:

- a) A dedicated email address for all AI policy-related inquiries:
  - i) support@generisonline.com
- b) Users can expect responses to their queries within 1–3 business days.

### 2) Telephone:

- a) A toll-free number for real-time assistance with urgent matters:
  - i) +1-646-666-9601
- b) Support is available during standard business hours, Monday through Friday.

### 3) Online Contact Form:

- a) A secure web-based form available on Generis Global's platforms for submitting detailed inquiries or complaints.
- b) Users receive a tracking number for their submissions to monitor the resolution process.

### 4) Regional Support Centers:

a) Regional offices or partners provide localized support for users in specific jurisdictions. Contact details for these centers are accessible through Generis Global's website.

### SUPPORT FOR ESCALATIONS

### 1) Second-Level Support:

a) Complex or unresolved issues are escalated to specialized teams, such as data protection officers or AI ethics committees.

### 2) Compliance Inquiries:

a) Regulatory or compliance-related questions are directed to the relevant department within Generis Global.

### 14. APPENDICES

The appendices provide supplementary information to enhance the understanding of the **Generis Global AI Agent Policy**. This section includes a comprehensive glossary of terms, an FAQ section to address common concerns, and supporting documentation to clarify specific aspects of the policy.

### **APPENDIX A: GLOSSARY OF TERMS**

The following terms are defined to ensure clarity and precision in interpreting this policy:

### **Artificial Intelligence (AI):**

A field of computer science focused on creating systems capable of performing tasks that typically require human intelligence, such as learning, problem-solving, and decision-making.

### **AI Agent:**

A software program designed to simulate human-like interactions and automate tasks using artificial intelligence technologies, including machine learning, natural language processing, and decision-making algorithms.

#### **Generis Global:**

A Swiss Verein that operates as an umbrella organization for a network of independent member firms providing legal, professional, and advisory services globally.

#### User:

Any individual, client, end-user, or organization that interacts with Generis Global's platforms, AI agents, or services.

### **Explicit Consent:**

An affirmative agreement provided by users, often documented through digital or physical means, that permits the collection, processing, or use of their data for specified purposes.

### **Granular Consent:**

A detailed level of consent where users can approve or decline specific types of data collection, processing activities, or AI interactions independently of each other.

#### **Escalation:**

The process of redirecting an issue, query, or interaction from an AI agent to a human representative for further handling or resolution.

### **Data Privacy:**

The protection and responsible handling of personally identifiable information (PII) to ensure compliance with global regulatory frameworks and ethical standards.

### **Operational Security (OpSec):**

Measures and protocols designed to protect proprietary systems, methods, and sensitive information from unauthorized access or disclosure.

#### **Data Localization:**

A regulatory requirement mandating that data collected in a specific jurisdiction is stored and processed within that jurisdiction.

### Feedback Loop:

A systematic process for collecting user feedback, analyzing performance, and implementing improvements in AI systems and services.

### APPENDIX B: FREQUENTLY ASKED QUESTIONS (FAQS)

### 1. What are AI agents, and how do they operate within Generis Global?

AI agents are software programs that facilitate user interactions, automate administrative tasks, and provide procedural or informational assistance. They operate within pre-defined algorithms and are governed by ethical and operational guidelines.

### 2. Can AI agents provide legal advice?

No, AI agents are not licensed professionals and cannot provide legal advice. They are limited to delivering procedural support and general information. For case-specific legal advice, users should consult licensed attorneys.

### 3. How does Generis Global ensure my data is secure?

Generis Global employs encryption, access controls, and compliance with regulations such as GDPR and CCPA to protect user data. All data management processes are monitored and audited regularly.

### 4. What happens if an AI agent provides incorrect information?

Users can report inaccuracies through Generis Global's complaint mechanisms. A dedicated team reviews the issue and provides corrections or further assistance.

### 5. Can I opt out of interacting with AI agents?

Yes, users have the right to opt out of AI interactions and request human support at any point during their engagement with Generis Global's platforms.

### 6. What data do AI agents collect?

AI agents may collect interaction data, user-provided details (e.g., names or email addresses), and metadata (e.g., IP addresses or device types). Data collection is limited to legitimate business purposes outlined in the policy.

### 7. How does Generis Global handle complaints about AI systems?

Complaints are handled through a structured process that includes acknowledgment, investigation, and resolution. Users can escalate unresolved issues to senior management or independent grievance committees.

### APPENDIX C: SUPPORTING DOCUMENTATION

#### 1. AI USAGE DISCLOSURE STATEMENT

Generis Global is committed to transparency regarding the role of AI in its operations. Users are notified of AI involvement through:

- 1. Explicit disclaimers such as "This interaction is powered by AI."
- 2. Notifications during chat-based or automated email responses.

#### 2. DATA COLLECTION TRANSPARENCY GUIDELINES

Generis Global ensures that users are informed about data collection practices through:

- 1. Privacy policy links provided before data collection.
- 2. Granular consent options allowing users to select which data they wish to share.

#### 3. FEEDBACK SUBMISSION GUIDELINES

Users can submit feedback on their experiences with AI agents through:

- 1. Online forms with fields for describing the issue, providing suggestions, and rating satisfaction.
- 2. Support channels where feedback is categorized for actionable insights (e.g., performance issues, ethical concerns).

### 4. ESCALATION REQUEST PROCESS

Generis Global provides a streamlined process for escalating issues to human representatives:

- 1. Users can request escalation via chat commands, email, or phone.
- 2. The escalation request is immediately logged, and the user is assigned a case number.
- 3. A human representative reviews the case and responds within the standard resolution timeframe.

#### 5. POLICY UPDATE NOTIFICATIONS

Generis Global ensures users are informed about changes to this policy through:

- 1. Email announcements summarizing the updates.
- 2. Platform notifications prompting users to review and accept revised terms.

#### 6. AI MONITORING AND AUDIT PROTOCOL

To ensure AI systems meet quality, ethical, and operational standards:

- 1. Routine audits are conducted to evaluate AI agent performance, detect anomalies, and refine algorithms.
- 2. User feedback is incorporated into audit reports to improve future interactions.

#### APPENDIX D: REGULATORY REFERENCES

This appendix provides a comprehensive list of regulatory frameworks and standards that govern the deployment and operation of AI systems across Generis Global's platforms. It ensures compliance with local and international legal, ethical, and professional requirements across the jurisdictions in which Generis Global operates.

#### **GLOBAL STANDARDS**

- 1) General Data Protection Regulation (GDPR) (European Union):
  - a) Governs the collection, storage, and processing of personal data for individuals within the EU.
  - b) Key Requirements:
    - Data minimization, purpose limitation, and lawful basis for data processing.
    - ii) User rights to access, rectify, and delete their data (Right to be Forgotten).
    - iii) Mandatory Data Protection Impact Assessments (DPIAs) for high-risk AI applications.
  - c) Applicability: All AI-driven systems interacting with or processing data of EU citizens.

### 2) California Consumer Privacy Act (CCPA) (United States):

- a) Regulates data privacy rights for California residents.
- b) Key Requirements:
  - i) Transparency in data collection practices, including clear opt-out mechanisms.
  - ii) Disclosure of data monetization practices and user rights to access collected data.
- c) Applicability: All platforms offering services to California-based users.

### 3) Personal Data Protection Act (PDPA) (Singapore):

- a) Protects personal data and governs its collection, use, and disclosure.
- b) Key Requirements:
  - i) Obtaining consent for data collection and processing.
  - ii) Mandatory data breach notification to the Personal Data Protection Commission (PDPC).

# 4) Health Insurance Portability and Accountability Act (HIPAA) (United States):

- a) Protects the privacy and security of healthcare information.
- b) Applicability:
  - i) AI-driven systems used for healthcare-related interactions or data processing.

#### MIDDLE EAST

### 1) UAE Data Protection Law (Federal Decree-Law No. 45 of 2021):

- a) Regulates personal data handling in the United Arab Emirates.
- b) Key Requirements:
  - i) Prohibits data processing without clear consent.

ii) Mandates data localization for sensitive information unless exemptions apply.

### 2) Saudi Arabia Personal Data Protection Law (PDPL):

- a) Establishes comprehensive data privacy and processing rules.
- b) Key Requirements:
  - Restrictions on cross-border data transfers unless adequate safeguards are in place.
  - ii) Requires explicit consent for personal data processing.

#### **AFRICA**

### 1) Protection of Personal Information Act (POPIA) (South Africa):

- a) Governs the lawful processing of personal data in South Africa.
- b) Key Requirements:
  - Data processing must adhere to the principles of accountability, transparency, and security.
  - ii) Data breach reporting to the Information Regulator within a prescribed timeframe.

### 2) Nigeria Data Protection Regulation (NDPR):

- a) Sets guidelines for the collection and processing of personal data in Nigeria.
- b) Key Requirements:
  - i) Mandates compliance with data protection principles, such as purpose specification and data minimization.
  - ii) Requires Data Protection Impact Assessments for high-risk data processing activities.

#### **ASIA-PACIFIC**

### 1) Australia Privacy Act 1988:

- a) Protects personal data and regulates data handling practices for Australian citizens.
- b) Key Requirements:
  - i) Transparency in privacy policies and data collection practices.
  - ii) Mandates compliance with the Australian Privacy Principles (APPs).

### 2) Japan's Act on the Protection of Personal Information (APPI):

- a) Focuses on the protection of personal data and user rights.
- b) Key Requirements:
  - i) Consent for cross-border data transfers.
  - ii) Notification of data breaches to affected users.

#### **SOUTH AMERICA**

### 1) Lei Geral de Proteção de Dados (LGPD) (Brazil):

- a) Comprehensive data protection law governing personal data use in Brazil.
- b) Key Requirements:
  - i) User consent as a basis for data processing.
  - ii) Data breach notification within 72 hours to the National Data Protection Authority (ANPD).

### 2) Argentine Personal Data Protection Law (Act 25,326):

- a) Regulates data protection and privacy rights in Argentina.
- b) Key Requirements:
  - i) Obligations for data controllers to protect user information.
  - ii) Provides users the right to access, correct, and delete their data.

### **EUROPE AND INTERNATIONAL STANDARDS**

### 1) European Commission's Ethics Guidelines for Trustworthy AI:

- a) Provides non-binding ethical guidelines to ensure the fair and responsible use of AI technologies.
- b) Key Focus Areas:
  - i) Human agency and oversight.
  - ii) Robustness and accountability in AI systems.

### 2) OECD Principles on Artificial Intelligence:

- a) Establishes principles for the ethical use of AI across member countries.
- b) Key Principles:
  - i) AI systems should be inclusive, sustainable, and aligned with societal well-being.
  - ii) Transparency and explainability of AI decisions.

#### OPERATIONAL SECURITY IN REGULATORY COMPLIANCE

Generis Global ensures that all data collection, processing, and AI deployments comply with these regulatory frameworks. While specific details of internal processes and implementations are not disclosed for security reasons, the organization maintains robust safeguards to ensure ongoing compliance and user trust.

#### **PROFESSIONAL GUIDELINES:**

- 1. American Bar Association's Model Rules for the use of AI in legal practices.
- 2. European Commission's Ethics Guidelines for Trustworthy AI.

### **HEALTHCARE REGULATIONS (IF APPLICABLE):**

1. Health Insurance Portability and Accountability Act (HIPAA) (United States).

#### APPENDIX E: TECHNICAL AND OPERATIONAL SECURITY MEASURES

#### 1. ENCRYPTION STANDARDS

Generis Global uses industry-standard encryption protocols, including TLS (Transport Layer Security) for data in transit and AES (Advanced Encryption Standard) for data at rest.

#### 2. ACCESS CONTROLS

- 1. Role-based access permissions ensure that only authorized personnel can access sensitive data.
- 2. Multi-factor authentication (MFA) is implemented across internal systems.

#### 3. INCIDENT RESPONSE PLANS

Generis Global maintains a structured incident response plan to address:

- 1. Data breaches.
- 2. Unintended AI outputs impacting users.

### 4. REGULAR TESTING AND UPDATES

- 1. AI systems undergo routine penetration testing to identify vulnerabilities.
- 2. Updates to AI systems are tested in controlled environments before deployment.

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