

# PCPD's Key Regulatory Focus on AI in the Workplace

When will PDPO apply?

When an **AI system** in workplace is ...

If the system **involves** ...

**Personal Data (Privacy) Ordinance applies**

 **Developed**

or

 **Utilised**

## Personal Data's


 **Holding**

 **Collection**

 **Use**

 **Processing**

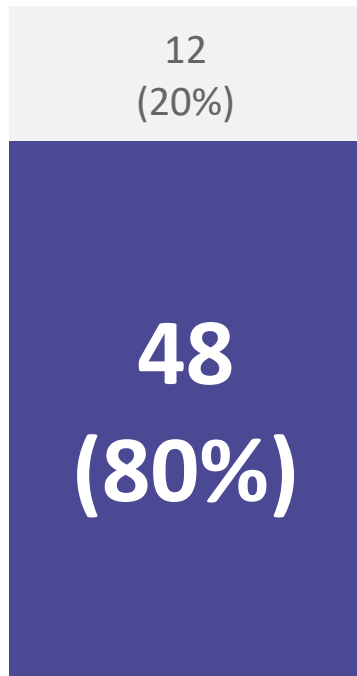
 **Technology-neutral**

 **Principle-based**

- 6 Data Protection Principles

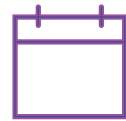
# Result of Compliance Checks in February 2025

(80%) used AI in their day-to-day operations



Used AI

Amongst the 48 organisations using AI in their day-to-day operations



Been using AI for over a year

42 (88%)



Used 3 or more AI systems

26 (54%)



Collected and/or used personal data through AI systems

24 (50%)

Source: PCPD

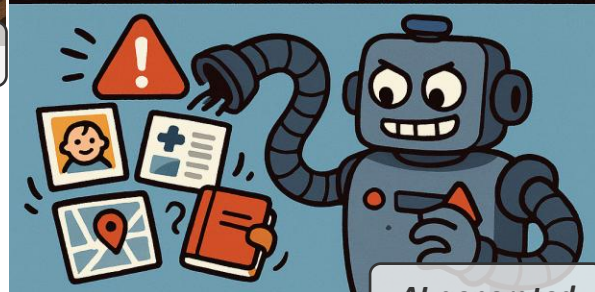
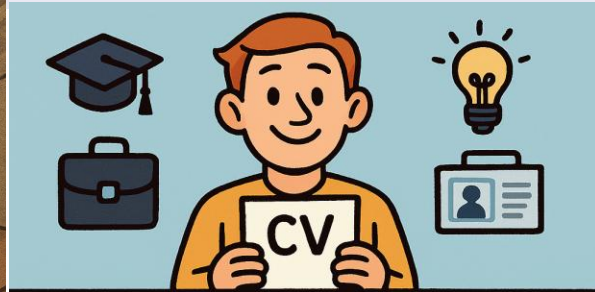
# Key Risks

## 🔒 Data Breach



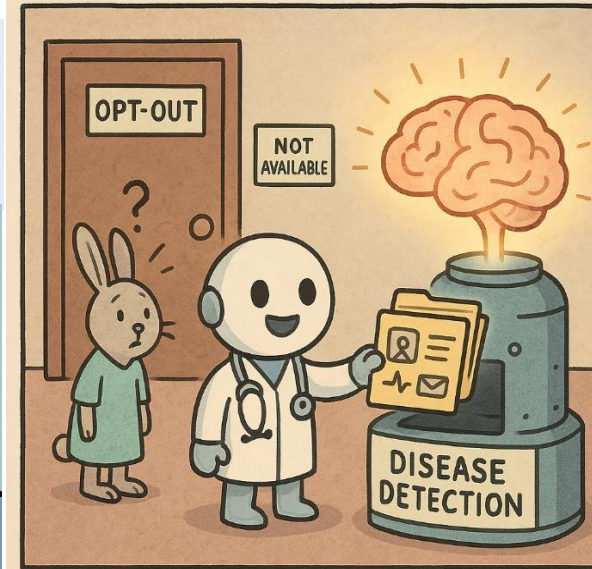
AI-generated

## 📦 Excessive Data Collection



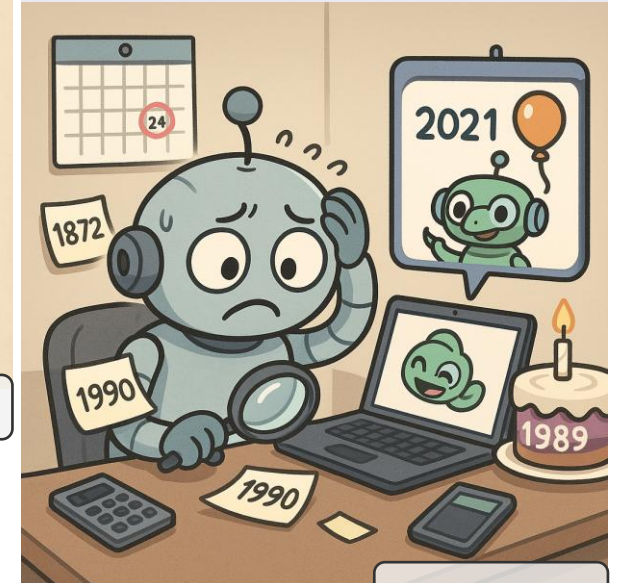
AI-generated

## 🚫 Misuse of PD



AI-generated

## ✅ Data Accuracy



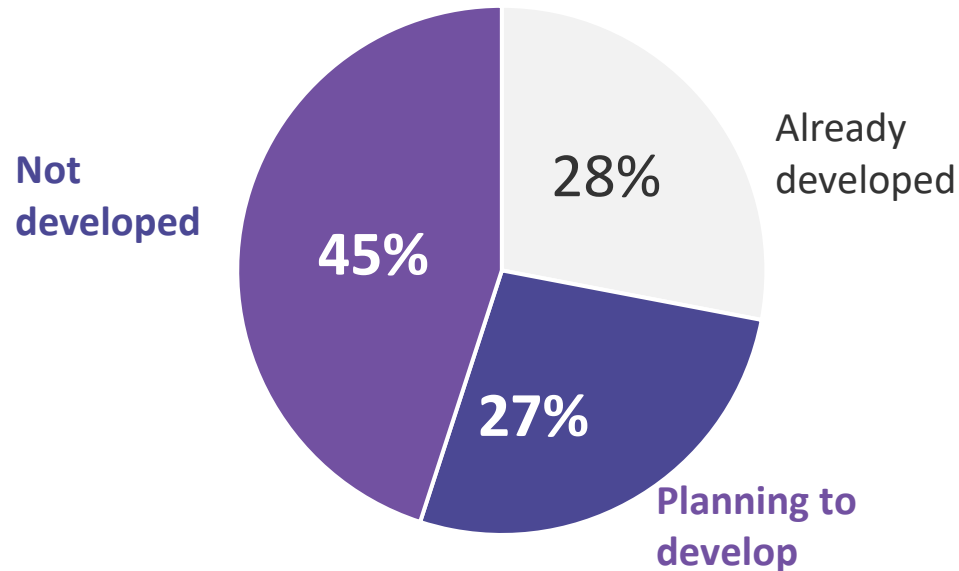
AI-generated


# Enterprises' Readiness

 **Around 30% of enterprises using AI have developed an AI security policy**

## Availability of an AI security policy

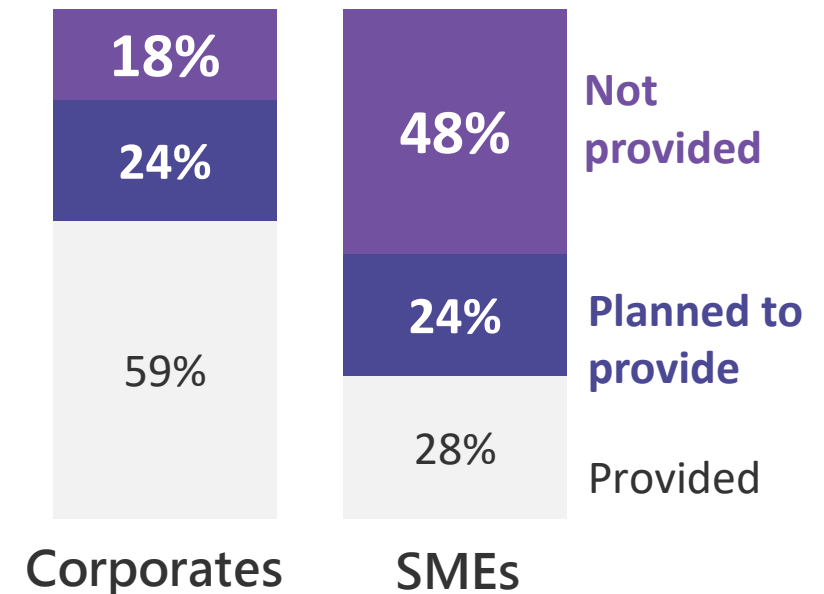
Hong Kong enterprises using AI in their operations in 2024



 **There could be more AI training for employees, especially for SMEs**

## Provision of AI training to employees

Hong Kong enterprises using AI in their operations, 2024



Source: PCPD

# PCPD's International Participation

## Global Privacy Assembly (GPA)

 Co-chair of “Ethics and Data Protection in Artificial Intelligence Working Group”



**Strategic role** in international collaboration on privacy protection and security in the context of AI

- **Facilitate exchanges and cooperation with international counterparts**
- **Undertake global joint actions as appropriate**



### Co-sponsor of 3 Resolutions



Resolution on **Accountability in the Development and Use of AI**



Resolution on **Generative AI Systems**



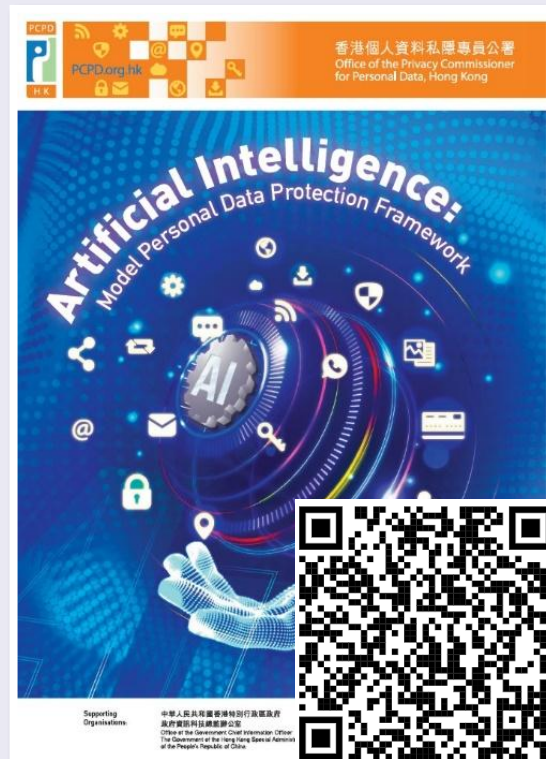
Resolution on **AI and Employment**

# PCPD's Guidance in response to AI development

## Organisations



Aug 2021

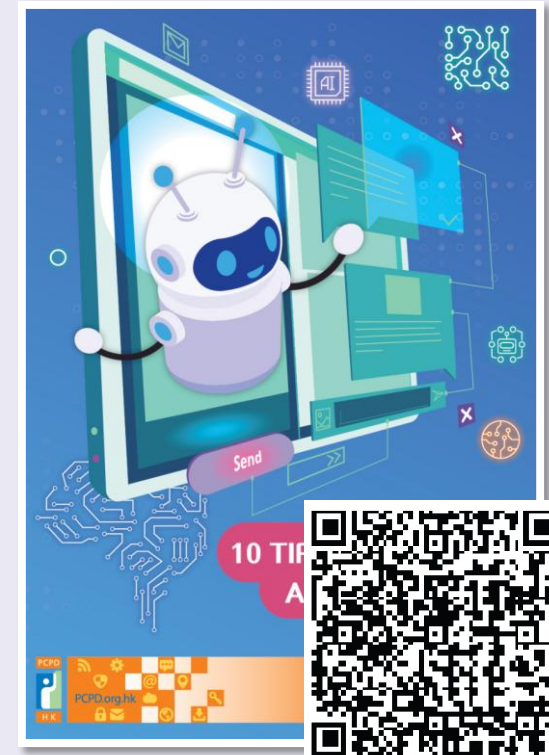


Jun 2024



Mar 2025

## Public



Sep 2023

# Artificial Intelligence: Model Personal Data Protection Framework



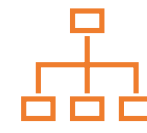
**ESTABLISH**  
AI Strategy and  
Governance



**AI Strategy**



**Governance  
Considerations**



**Governance  
Structure**



**Training and  
Awareness  
Raising**



**CONDUCT**  
Risk Assessment  
and  
Human Oversight

*Lower*

*Risk level of AI system*

*Higher*



**Human-out-of-the-loop**  
AI makes decisions without  
human intervention



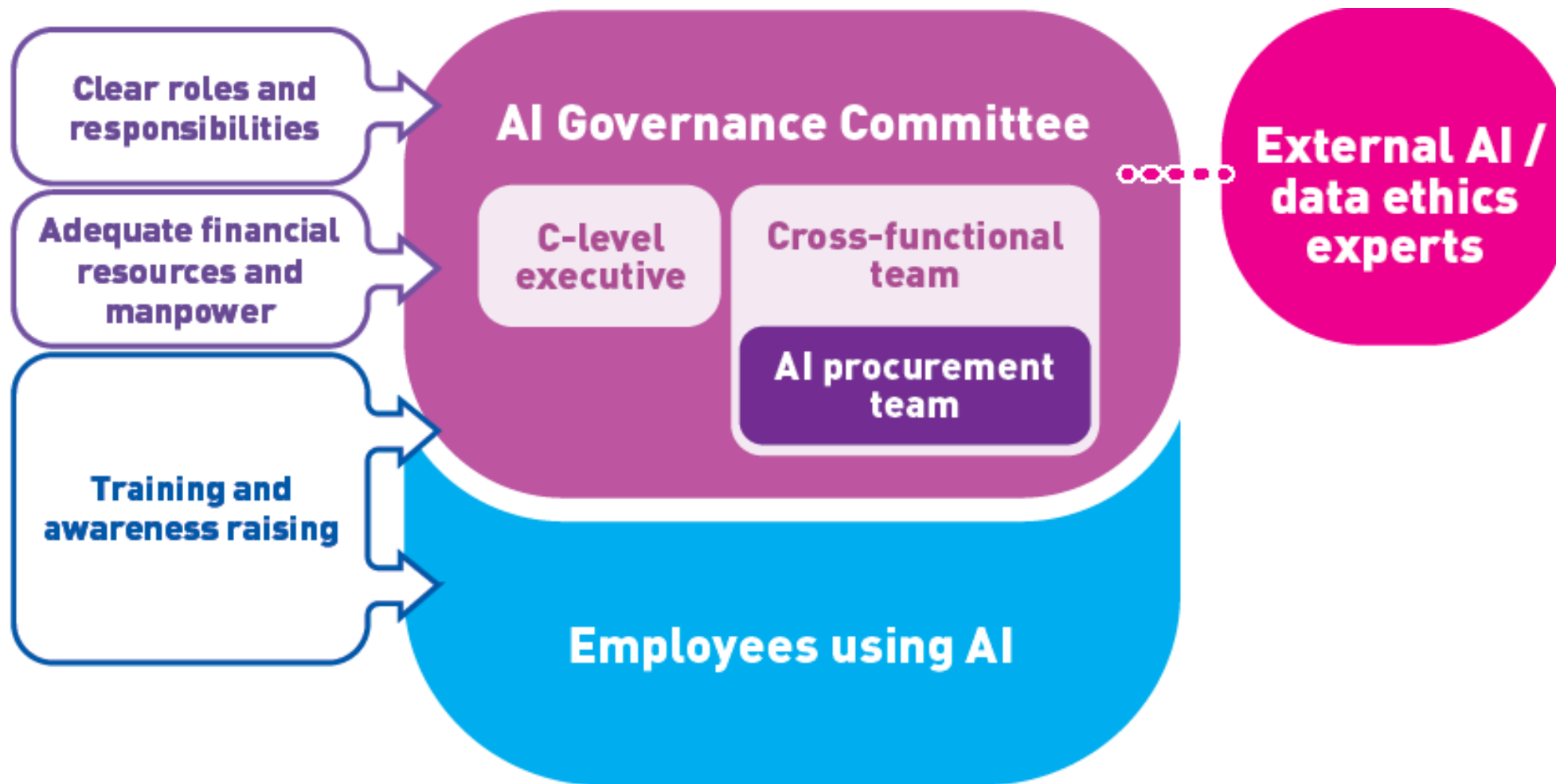
**Human-in-command**  
Human actors oversee the  
operation of AI and intervene  
whenever necessary



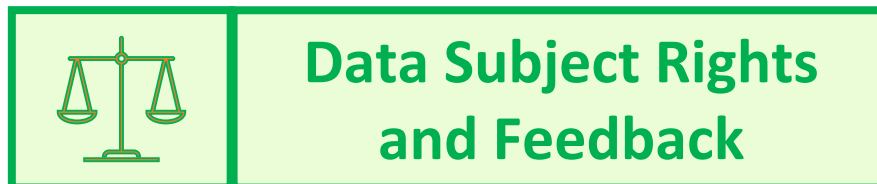
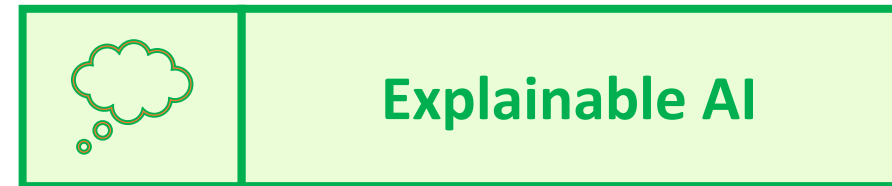
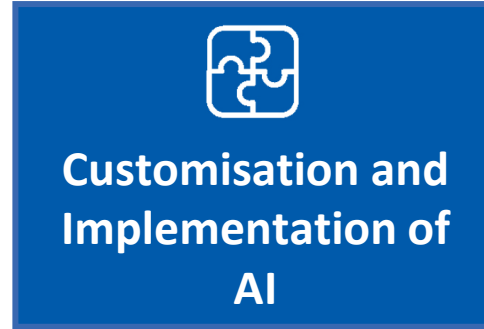
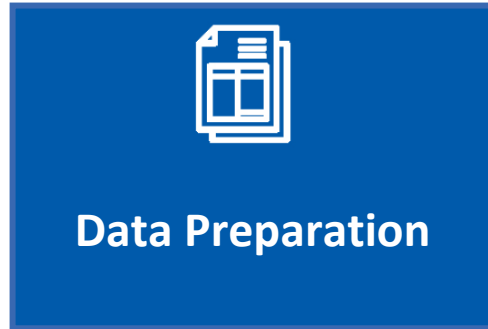
**Human-in-the-loop**  
Human actors retain  
control in the  
decision-making process

# Formulate AI Strategy and Governance

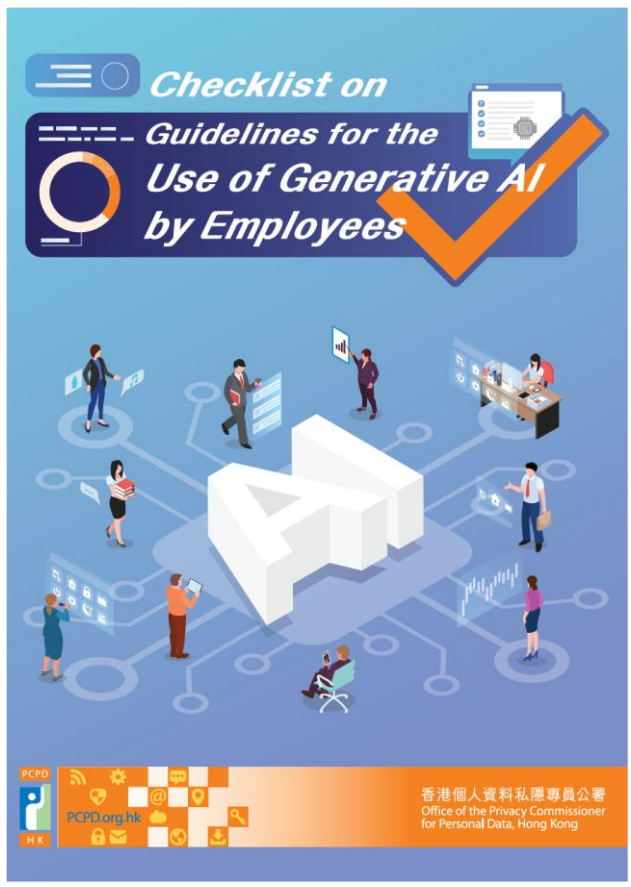
## Governance structure




# Artificial Intelligence: Model Personal Data Protection Framework



# Checklist on Guidelines for the Use of Generative AI by Employees



 To help organisations devise internal policies or guidelines for employees' use of GenAI at work while complying with the requirements of the PDPO



**Scope**



**Protection of Personal Data Privacy**



**Lawful and Ethical Use and Prevention of Bias**



**Data Security**



**Violations of the policies or guidelines**

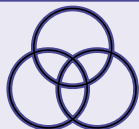
# Good Practices of AI Governance

1



Establish an AI governance committee

2



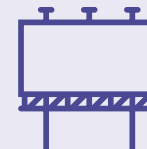
Consider data privacy risks in risk assessments

3



Implement internal guidelines on the use of AI

4



Provided training on AI for staff

5



Develop an AI incident response plan