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香港個人資料私隱專員公署
Office of the Privacy Commissioner
for Personal Data, Hong Kong

Practising Governance – 2025 Annual Conference

AI at Work:

From Practical Insights to What's Next

PCPD's Checklist on Guidelines for the Use of Generative AI by Employees

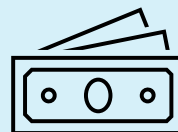
Ms Joanne WONG
Assistant Privacy Commissioner for Personal Data
(Compliance, Global Affairs and Research)

24 October 2025

Why does AI Governance Matter?

Compliance with laws and regulations on AI

- EU's **Artificial Intelligence Act**
- Mainland's
 - **National policies** (e.g. AI Safety Governance Framework)
 - **AI-specific regulations** (e.g. Measures for Labelling Artificial Intelligence-Generated Synthetic Content)



Compliance with existing legal frameworks

- Hong Kong's **Personal Data (Privacy) Ordinance (PDPO)** is a piece of principle-based and **technology-neutral** legislation



Financial loss and leakage of trade secrets

- Fraudsters may use AI technologies to orchestrate scams
- Unintended disclosure of trade secrets may occur when employees upload sensitive information to AI tools

Reputational harm

- A lack of transparency or the misuse of personal data can cause irreparable harm to an organisation's reputation

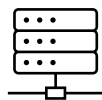
Local Context

According to the compliance checks conducted by PCPD in 2025, among the 60 organisations examined:

48 organisations (80%) used AI in their day-to-day operations. Among them:



42 organisations (around **88%**) had been using AI for over a year



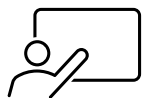
24 of them (**50%**) collected and/or used personal data through AI systems

Local Context

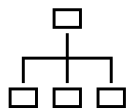
Among the 24 organisations that collected and/or used personal data through AI systems:



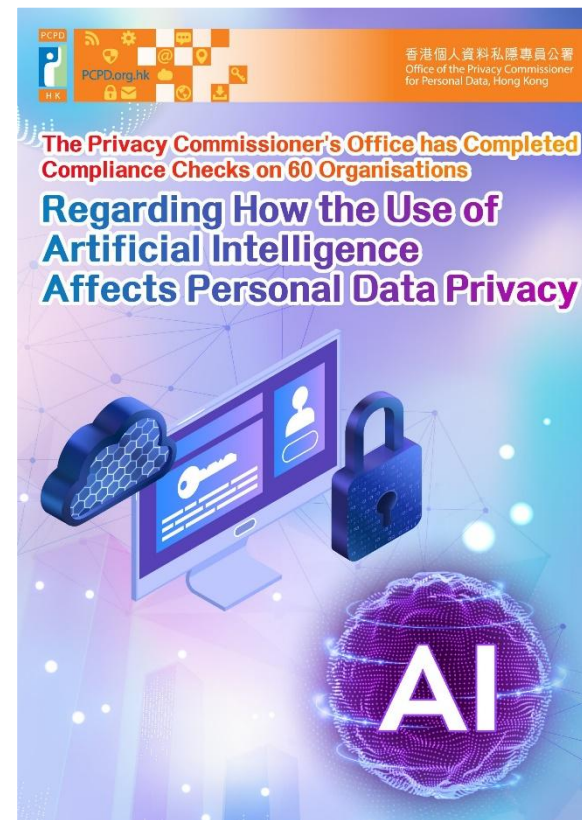
15 of them (about **63%**) formulated policies related to AI



18 of them (**75%**) provided training for employees regarding AI

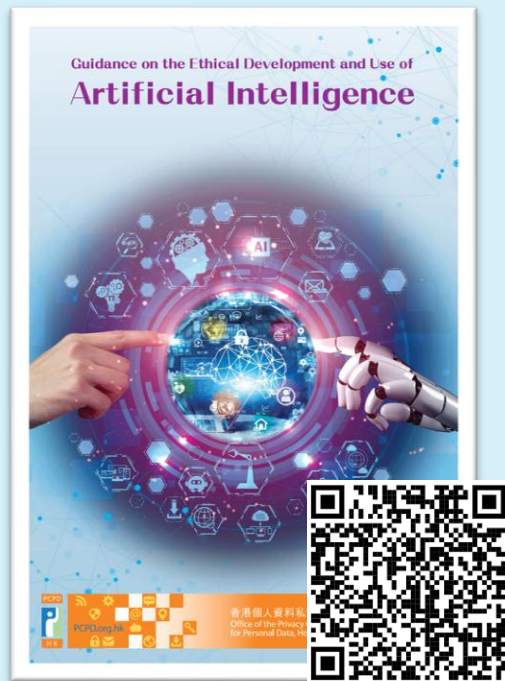


19 of them (about **79%**) established AI governance structures

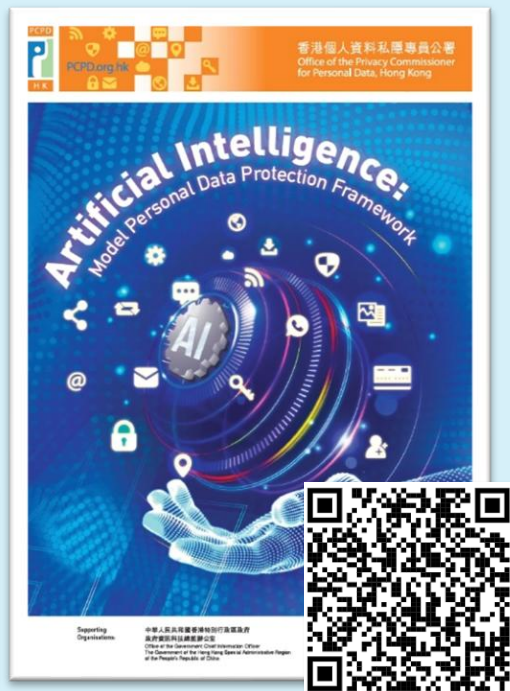


PCPD's Guidance Materials on AI

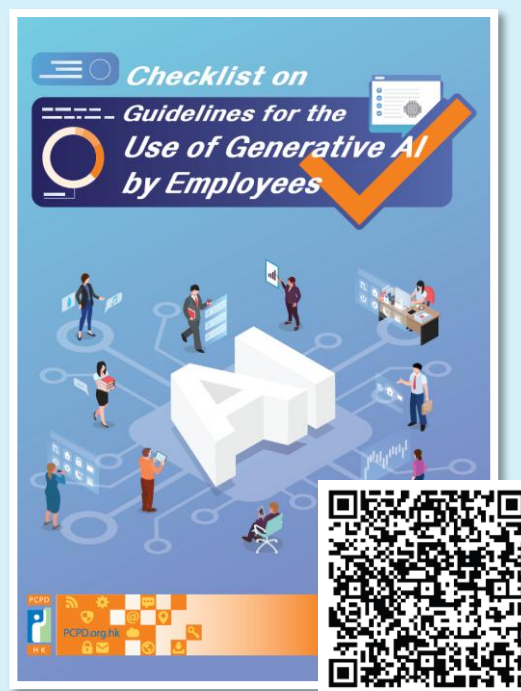
For organisations



(August 2021)



(June 2024)



(March 2025)

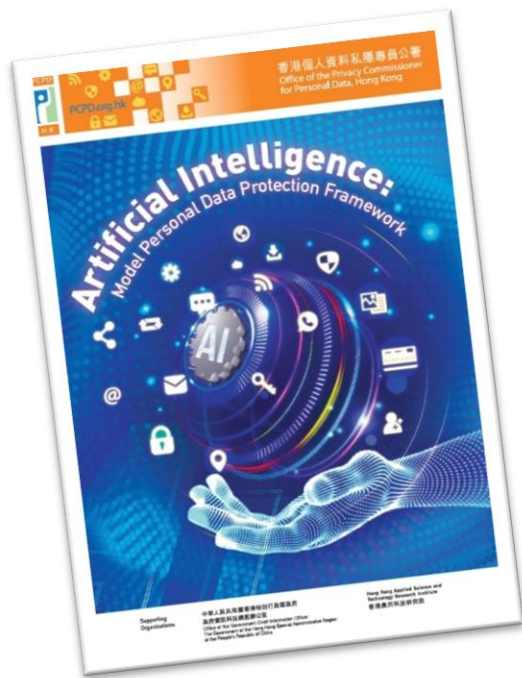
For the public



(September 2023)

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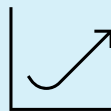
Artificial Intelligence: Model Personal Data Protection Framework (June 2024)



Assist organisations in **complying with the requirements of the PDPO**



Ensure AI security

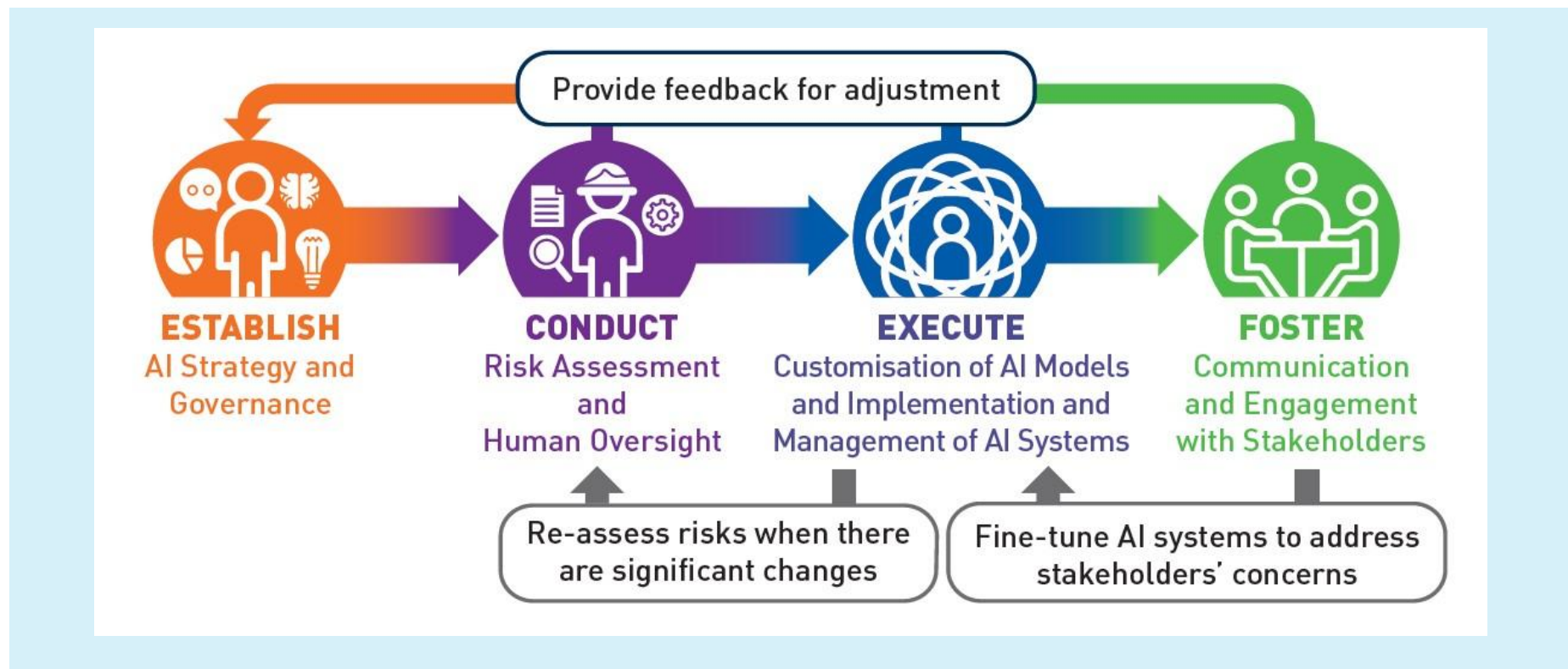


Increase competitiveness



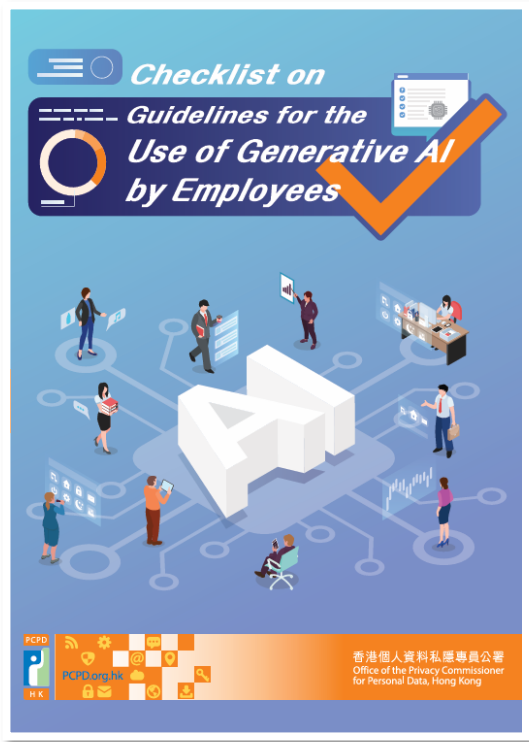
Provide a set of **recommendations on AI governance and the best practices for organisations procuring, implementing and using any type of AI systems, including generative AI (Gen AI), that involve the protection of personal data privacy**

Model Personal Data Protection Framework



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Checklist on Guidelines for the Use of Generative AI by Employees (March 2025)



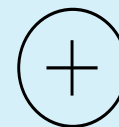
Objective

To assist organisations in developing internal policies or guidelines on the use of Gen AI by employees at work while complying with the requirements of the PDPO

Features



Presented in the form of a **checklist**



As a matter of good practice, organisations should devise their own policies and guidelines in **alignment with their values and mission**

Recommended Coverage of Gen AI Policies or Guidelines



Scope



Protection of
personal data privacy



Lawful and ethical use and
prevention of bias



Data security



Consequences of
violations of the policies
or guidelines

Aspects

Details



Permitted tools

Clearly specify the Gen AI tools and applications permitted within the organisation, e.g.:

- Publicly available Gen AI tools or applications
- Internally developed Gen AI tools or applications



Permissible use

Specify the tasks or activities for which employees can use Gen AI, e.g.:

- Drafting
- Summarising information
- Creating textual, audio and/or visual content



Policy applicability

Specify if the policy applies organisation-wide, to specific departments, ranks, and/or employees

Protection of Personal Data Privacy



Permissible types and amounts of input information

Provide clear instructions on:

- ✓ **the types and amounts** of information that **can** be inputted into Gen AI tools
- ✗ **the types of information** that **cannot** be inputted



Permissible storage of output information

Require that the information generated by Gen AI tools be stored according to the organisation's **information management policy** and deleted according to its **data retention policy**



Permissible use of output information

Provide clear instructions on the **permissible purposes** for using the information (including personal data) generated by Gen AI tools, and whether, when and how such personal data should be **anonymised before further use**

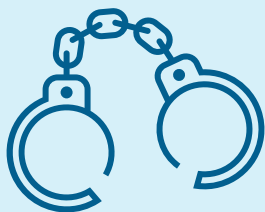


Compliance with other relevant internal policies

Ensure that the **policy on the use of Gen AI is aligned with the organisation's other relevant policies**

Lawful and Ethical Use and Prevention of Bias

Unlawful activities



Employees shall **not use Gen AI tools for unlawful or harmful activities**

Importance of employees acting as human reviewers



Accuracy and verification

Emphasise that employees need to **verify the information provided by AI**



Prevention of bias and discrimination

Alert employees to the possibility that AI-generated output can be **biased and discriminatory**
Set out the **correction and reporting mechanisms**



Watermarking or labelling

Provide instructions on **when and how** AI-generated output should be **watermarked or labelled**

Data Security

Permitted devices



Specify the **devices** on which employees are permitted to **access Gen AI tools**

Permitted users



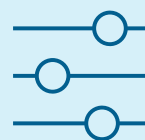
Specify the **permitted users** of Gen AI tools

Robust user credentials



Require employees to use **unique and strong passwords** along with **multi-factor authentication**

Security settings



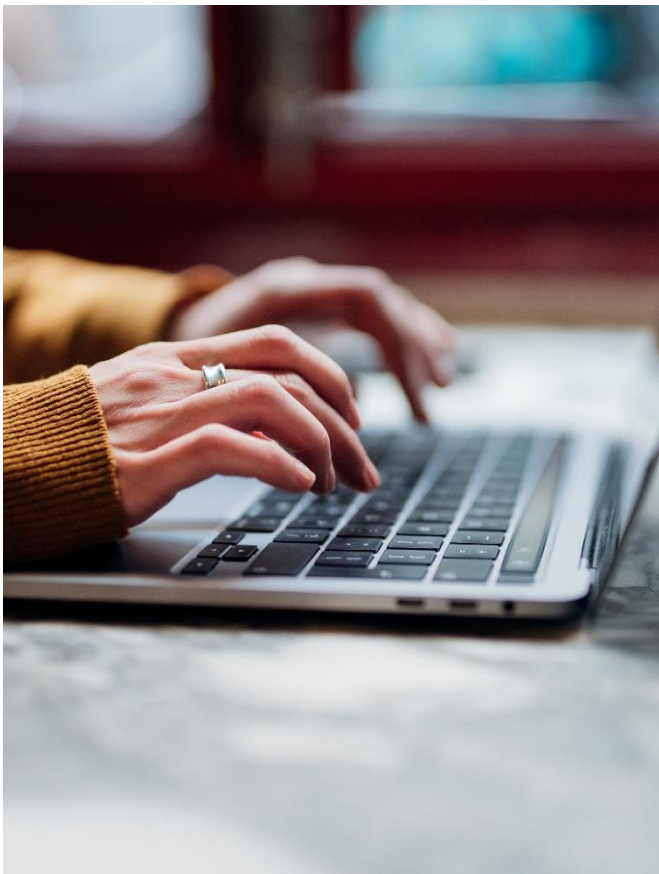
Require employees to **maintain stringent security settings**

Response to AI incidents and data breach incidents



Require employees to report AI incidents according to the organisation's **AI incident response plan**

Enhance AI Security = Enhance Competitiveness



Download AI-related guidelines from PCPD's webpage



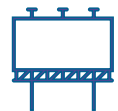
Evaluate organisation's strategies on the use of AI



Develop relevant governance strategies and framework, draft relevant internal policies or guidelines



For enquiries, please contact PCPD's "AI Security Hotline" (2110 1155)



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