

Real Group	IMS	Schedule: IP52
Authorised: Graham Lewis	Effective date: 08/2024	Issue: 01

IP52 Artificial Intelligence (AI) and Machine Learning Policy

Purpose and Scope of AI and Machine Learning Use by Real Group

Real Group has started to use AI and machine learning technologies to support staff across the company. This initially involves using existing machine learning models and commercially available AI tools, but in time we expect to use or develop additional services as the technology advances. This policy will be updated with details of any new services or technologies as they are approved for use.

Data Collected for Machine Learning Model Training

We will use data from delegates, staff and tutors from a variety of data sources controlled by Real Group, including:

- * Online learning platforms
- * Chat/message logs
- * Information from live training on video conferencing tools
- * Emails
- * Feedback forms

Data will be collected to the extent necessary for the testing, training and improvement of machine learning models. Where possible, personally identifiable information, such as names, addresses, or contact information, will be scrubbed prior to data being used to train or improve a model; unless informed explicit written permission is granted from a data subject for their data to be used without anonymisation.

Real Group will take appropriate technical and organisational security measures to protect data from unauthorised access, use, disclosure, alteration, or destruction.

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Data Retention and Cessation of Processing

The data used for testing, training or improving a model may be stored for a limited period of time for research and quality assurance purposes. Anonymised data may be retained indefinitely.

Users can request the cessation of having their data used for the training and improving of a model by contacting Real Group's Data Manager via dataprotection@realgroup.co.uk. Where possible data used to train a machine learning model will be deleted should a data subject opt out of having their data processed in this way, however if the data has been anonymised prior to use this may not be possible.

Transparency

We aim to provide transparent explanations about our sentiment analysis practices and how they work in this policy as they are incorporated.

Real Group uses the following range of AI and machine learning processes to process data relating to data subjects:

- Amazon Comprehend <https://aws.amazon.com/comprehend/>
- Google Gemini Multi-Modal Model <https://deepmind.google/technologies/gemini/>

This list will be updated as more services are added.

Related Documents

IP36 Access Control Policy

IP42 Secure System Engineering Principles Policy

IP46 Data Protection Policy

IP50 Privacy Policy for Delegates, Staff and Tutors

Document history

Issue 1

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Initial release