ISACA
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Navigating Privacy in the Age of Generative AI: Challenges and Opportunities for CDPSE and CISM Professionals in Europe

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PERSONAL BACKGROUND

- Teacher by training (English, **history** and business economics)
- Accredited APMG Trainer for CISM, CISA and CDPSE certifications (ISACA)
- Co-founder / owner of SOCRAI / Genoly.biz (Human cybersecurity)
  - Consulting services on NIS2, ISO27001, GDPR
  - Awareness training for board and employees

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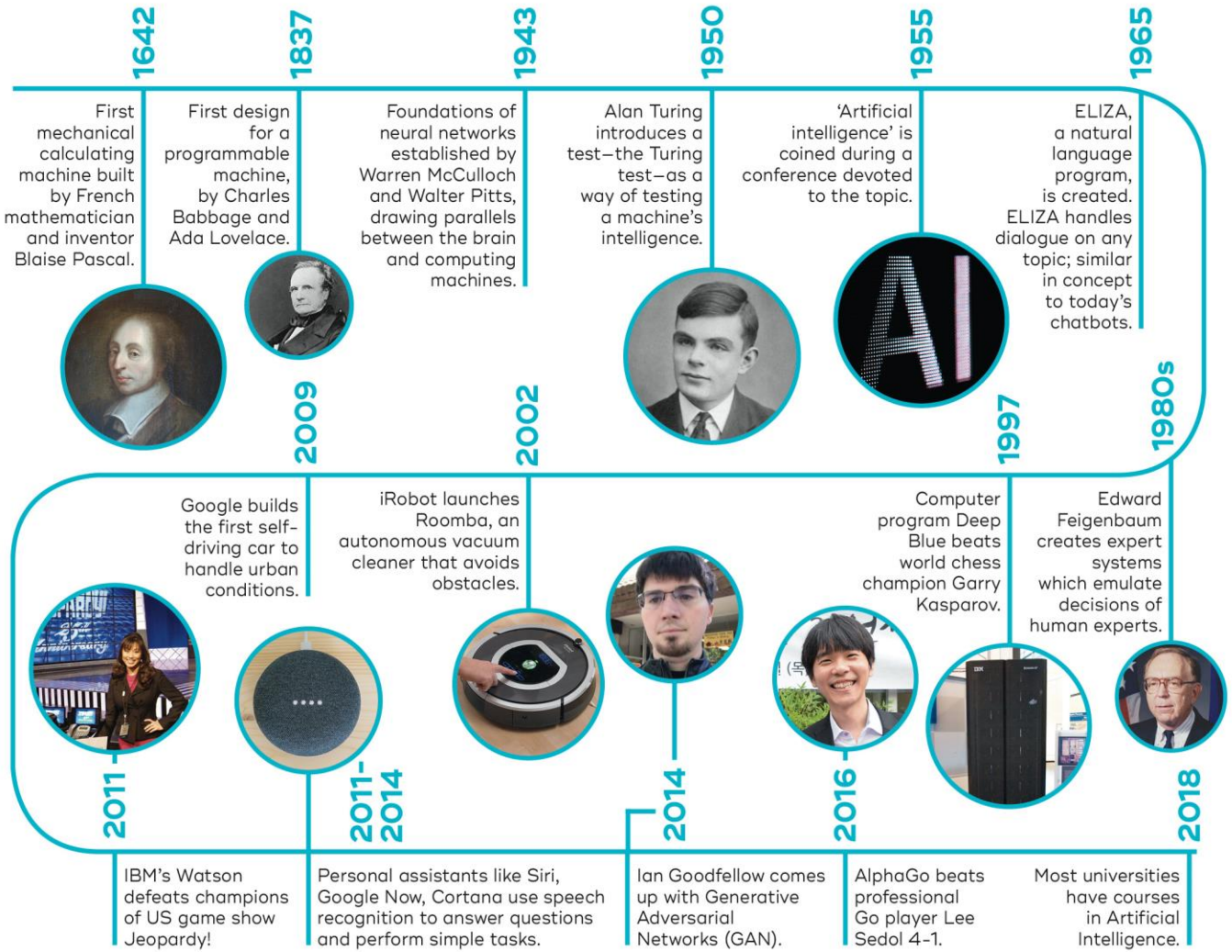
TOPICS

- Gen AI
- AI Act
- Shadow IT
- Opportunities for CISM and CDPSE
- Challenges for CISM and CDPSE
- GenAI inside CISM
- GenAI inside CDPSE

GEN AI



GAI Insights

11 Types of Generative AI Models

Text-to-Text	Text-to-Image	Image-to-Text	Image-to-3D	Image or Video-to-3D
- ChatGPT - Bing Chat - Bard - LLaMa (Meta) - Claude - ...many more	- Midjourney - DALL-E 3 - Stable Diffusion - Muse - Imagen - Bard	- ChatGPT - LLaVA - BakLLaVA - Flamingo - Visualart	- Dream Fusion - Magic3D	- CSM AI

Text-to-video	Text-to-Code	Image-to-Science	Text-to-Speech	Speech-to-text	Speech-to-Speech
- Runway - Cuebric - D-ID - Sad Talker	- GitHub Copilot - Amazon CodeWhisper - Google Codey	- Galatica - Minerva	- ElevenLabs - Speechify - Murf.AI - AudioLM	- Whisper	- ElevenLabs

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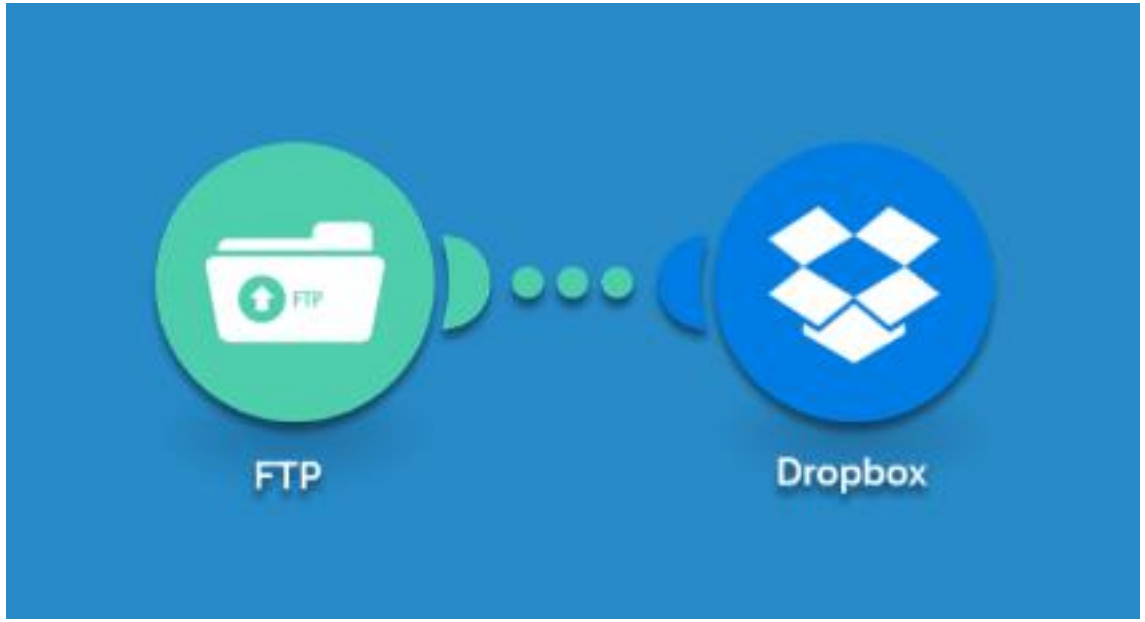
AI ACT (EU'S SAFETY MANUAL FOR AI)

- **What?** The European AI Act is a law in the European Union to regulate how AI (artificial intelligence) is built and used. The goal is to ensure AI is safe, trustworthy, and respects people's rights.
- **How?** The law divides AI into four levels of risk—just like ranking activities based on how dangerous they can be:
  - Unacceptable Risk (Banned)
  - High Risk (Strict Rules)
  - Limited Risk (Transparency Required)
  - Minimal Risk (No Specific Rules)
- **Impact?** If a company wants to use AI in the EU:
  - They need to know what risk level their AI falls into.
  - If they're using high-risk AI, they'll need to document everything, show that they're testing it for safety, and let people know how decisions are made.
  - For banned AI, companies can't use it at all.

SHADOW IT



OPPORTUNITIES

CISM

- **Governance and Strategy Development**
  - Policy Drafting Assistance
  - Security Maturity Assessment
  - Risk Framework Development
- **Risk Management and Threat Forecasting**
  - Risk Scenario Generation
  - Threat Landscape Analysis
  - Predictive Analysis
- **Security Operations and Incident Response**
  - Incident Response Playbooks
  - Post-Incident Reporting
  - Root Cause Analysis
- **Compliance and Audits**
  - Compliance Reports
  - Control Mapping
- **Security Awareness and Communication**
  - Tailored Training Materials
  - Management Reporting

CDPSE

- **Privacy Governance and Compliance**
  - Privacy Impact Assessments (PIAs)
  - Regulatory Research Summarization
  - Policy Generation:
- **Privacy Architecture Design**
  - Data Flow Mapping
  - Anonymization and Synthetic Data
  - Privacy-by-Design Templates
- **Data Lifecycle Management**
  - Data Classification
  - Data Retention Policies
  - Automated Data Deletion
- **Data Subject Rights and Transparency**
  - DSAR (Data Subject Access Request) Automation
  - Consent Management
  - Breach Notifications

CHALLENGES

CISM

- **Security and Risk Management Challenges**
  - New Attack Vectors
  - Data Leakage Risks
  - Limited Security Controls.
- **Governance and Accountability Issues**
  - Lack of Transparency
  - AI Misuse and Shadow IT
  - Vendor Risks
- **Incident Response and Threat Detection**
  - Synthetic Threats
  - Increased Incident Complexity

CDPSE

- **Privacy and Data Management Concerns**
  - Unintentional Use of Personal Data
  - Data Minimization
  - Synthetic Data Risks
- **Compliance and Regulatory Risks**
  - Regulatory Gaps:
  - Data Subject Rights (DSRs):.
  - Cross-Border Data Transfers:
- **Consent and Transparency Issues**
  - Lack of Explainability:.
  - Informed Consent:

GEN AI AND CISM

- **Information Security Governance**
  - Establishing governance frameworks to ensure ethical and compliant use of GenAI technologies.
  - Addressing AI-specific risks like data privacy, misuse of AI-generated content, and ethical concerns.
  - Ensuring that GenAI tools align with regulatory and industry standards.
  - Defining acceptable use policies for AI-generated content
- **Information Risk Management**
  - Identifying risks specific to GenAI, such as data poisoning, model theft, or misuse of synthetic data.
  - Conducting risk assessments to understand how GenAI systems impact confidentiality, integrity, and availability (CIA).
  - Evaluating risks associated with bias in models and potential intellectual property (IP) exposure.
  - Implementing controls to mitigate GenAI risks, such as protecting APIs and training data sources.
- **Information Security Program Development and Management**
  - Integrating GenAI-specific controls into the broader security program.
  - Managing access controls for GenAI systems, ensuring that only authorized personnel can use, modify, or deploy AI models.
  - Developing training programs to educate stakeholders about the risks and proper use of GenAI.
  - Defining policies for lifecycle management, including data used to train models and processes for updating models securely.
- **Information Security Incident Management**
  - Creating incident response plans for GenAI-related incidents, such as misuse of AI-generated outputs or compromise of AI infrastructure.
  - Implementing monitoring for unusual activity in GenAI models (e.g., excessive API requests or unauthorized attempts to train/deploy models).
  - Establishing processes to mitigate the effects of "hallucinations" or incorrect outputs in critical business contexts.
  - Managing post-incident reviews to understand the root cause and prevent recurrence of GenAI-related incidents.

GEN AI AND CDPSE

- **Provacy Governance**
  - Establishing governance policies for the ethical and compliant use of GenAI tools (e.g., GPT models or internal AI assistants).
  - Ensuring compliance with GDPR, CCPA, HIPAA, or other regulations related to data used for training and inference in GenAI systems.
  - Defining roles and responsibilities for GenAI system oversight to ensure accountability for privacy-related AI incidents.
  - Establishing frameworks for privacy impact assessments (PIAs) when deploying GenAI models, especially when they process personally identifiable information (PII).
  - Defining ethical guidelines for data minimization in Generative AI training data to avoid unnecessary exposure of private information.
- **Privacy Architecture**
  - Designing privacy-aware AI architectures that prevent sensitive data from being unintentionally exposed through training or outputs.\n
  - Implementing differential privacy techniques and synthetic data generation to protect the privacy of data used for training GenAI models.
  - Encrypting and pseudonymizing sensitive data inputs and outputs in GenAI APIs to ensure data privacy in transit and at rest.
  - Ensuring that GenAI model outputs do not inadvertently leak PII by developing post-processing filters for outputs.\n
  - Integrating data retention policies into GenAI systems to automatically delete training data after the model lifecycle requirements are met.
- **Data Lifecycle**
  - Ensuring that the data collection process for training and fine-tuning GenAI models adheres to consent and purpose limitations.\n
  - Implementing controls to avoid the use of real personal data when unnecessary by opting for synthetic or anonymized data.\n
  - Defining retention and deletion policies to ensure that personal data used for AI training or testing is deleted after use.\n
  - Auditing the data sources used for training GenAI models to ensure that no unlawful or unauthorized data is included.\n
  - Managing the data sharing processes in GenAI systems to ensure that third-party data usage (for APIs or plug-ins) adheres to privacy agreements.\n

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