PUBLIC CONSULTATION ON PROPOSED ADVISORY GUIDELINES ON USE OF PERSONAL DATA IN AI RECOMMENDATION AND DECISION SYSTEMS

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Comments

Section	Content	Comment
1.2	The focus of the Advisory Guidelines on the Use of Personal Data in AI Recommendation and Decision Systems under the Personal Data Protection Act ("Guidelines") is to clarify how the PDPA applies to the collection and use of personal data by organisations to develop and deploy systems that embed machine learning (ML) models ("AI Systems") which are used to make decisions autonomously or to assist a human decision-maker through recommendations and predictions.	We propose referring to "AI models" instead of ML models throughout. This is because ML models do not include AI rule-based model, graph analytics, logistic regression, ARIMA, etc.
2.1	Personal data is ==often== needed for an AI System development/training and testing so that ML models can make inferences from such data, and for monitoring the AI System after they have been deployed to ensure that they continue to perform as well as they are supposed to.	We propose "Personal data may be needed..." as for AI models, personal attributes and identifying data are not often used.
10.10	Organisations can consider using technical tools such as AI Verify to validate the performance of the AI System or ML model.	Would PDPC accept an industry specific test tool such as Veritas Toolkit for Financial Institutions? This is used by many Banks locally.