# Feedback for Draft Ethics Guidelines of EU Commission HL Group on AI

Technology Industries of Finland (*TIF)* considers Ethics Guidelines as a fit instrument to pave the way for human-centric application of data and AI to unleash the potential of data-economy and build trust on digital solutions.

In order to enhance its effectiveness, the document needs to be significantly shorter and the actionable content needs to be in focus.

**Main messages**

* Within the EU, fundamental choices have already been made to value highly privacy and other fundamental rights of human beings.
* What EU needs to lead the way on data-economy is to develop actionable best practices how to combine legal requirements to sound business and technology practices.
* There is no distinct set of ethical principles for AI but a need to find a way to apply AI on a way that is compatible with European values.
* AI is a domain where there are lots of ungrounded fears and doubts. We need real-life scenarios in order to have fruitful discussion. Human will be in charge of AI systems in foreseeable future.
* AI and sustainable use of data have the potential to transform the European societies and businesses to serve humans better than the existing ones.

Respecting Fundamental Rights, Principles and Values

TIF points out that many of the aspects covered in this section are already covered by the GDPR. TIF suggests to remove ‘Critical concerns raised by AI’ entirely. It is valuable to underline that humans need to be able to know when they are interacting with AI.

Realising Trustworthy AI

TIF underlines the importance of the *quality of data*. Quality of the AI systems, solutions and their outcomes is very much affected by the quality of the data. Thus, the quality of the datasets and knowledge on analysis of bias and other data-related issues in of paramount value on this European project.

When addressing transparency it is essential to focus on general intelligibility of the outcomes of AI applications, not transparency of neural networks or technological solutions themselves. Basically, what matters is information concerning datasets or categories of data used – not technical details.

Assessing Trustworthy AI

TIF regards this operational part as the most valuable one of the paper as it serves as a practical tool to guide developers and deployers to human-centric use of AI. What needs more attention is to better link this document to the GDPR. It does not suffice to refer to compliance with the regulation, but more in-depth analysis is needed. Usage of data will multiply in future and all parties gathering data need to take into account future needs. Europe and European companies need to quickly develop methods to collect and process data on a way that builds trust among people and companies and gives legal clarity on how to utilise data in AI solutions.

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