

# Waking Up to AI

An Adventure  
in Governance

Brian Myers  
with assistance from 

# Brian Myers PhD, CISSP, CCSK



SafetyLight LLC

## Experience

- 20 years in software development
- 10 years in information security

## Past Positions

- Director of InfoSec, WebMD Health Services
- Senior AppSec Architect, WorkBoard
- Senior Risk Advisor, Leviathan Security

## Current Work

- Independent Information Security Consultant

## Volunteer

- OWASP AppSec Days PNW (2021-2024)
- Western Oregon University CS Advisory Board

## Talks



Brian speaks at conferences, companies, chapter meetings, and universities, and would be happy to present at your organization too. More details about all Brian's talks are on [GitHub](#).

*Selected venues: ISACA, OWASP, BSides Seattle/Portland/Idaho, Oregon Cyber Resilience Summit, Western Oregon University, Technology Association of Oregon, PNSQC, and others.*

### Waking Up to AI: An Adventure in Governance

A fictional SaaS company's messy, revealing journey through AI risks, missteps, and gradual governance. [\[details\]](#) [\[slides\]](#)

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### Kidnapping a Library: How Ransomware Taught the British Library to Follow Well-Known Best Practices

A cautionary tale about how a ransomware attack crippled a major cultural institution and the measures taken to recover. [\[details\]](#) [\[slides\]](#) [\[video\]](#)

# Resources

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Here are all the links to resources mentioned in the talk (and a couple of extras as well.)

## AI Policies and Governance

- Drata: [Policy and Plan Guidance](#)
- Harmonic: [AI Policy Generator](#)
- Fairnow: [AI Governance Framework](#)
- ISACA: [Policy Template Toolkit](#)
- OECD AI Principles: [OECD AI Principles overview](#)
- SANS: [Security Policy Project](#)
- US Congress: [Advancing American AI Act and Executive Order 14110](#)
- World Economic Forum: [Adopting AI Responsibility](#)

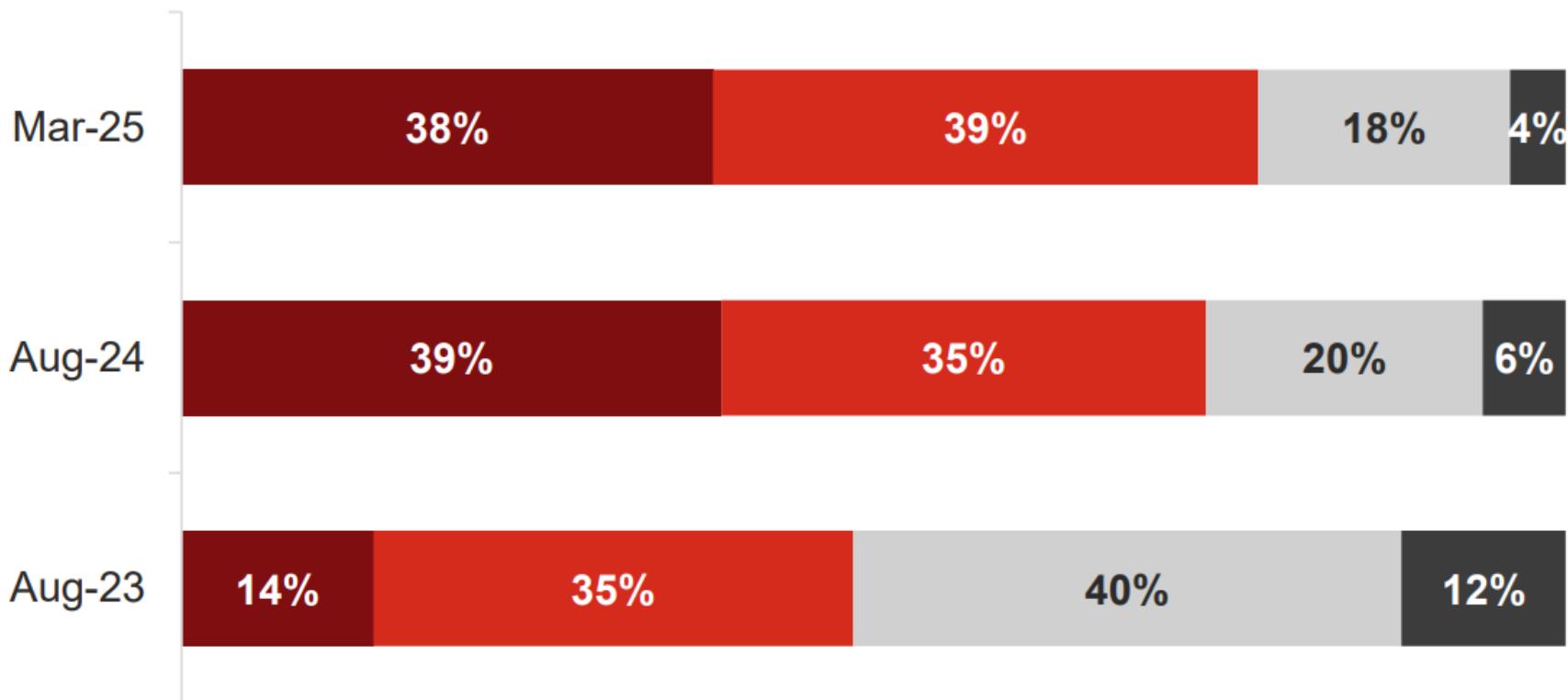
## Shadow AI & Adoption

- Axios: [What's New and What's Next](#)
- Help Net Security: [Your employees uploaded over a gig of files to GenAI tools last quarter](#)
- KPMG: [Trust, Attitudes, & Use of AI](#)
- McKinsey: [The state of AI: How organizations are rewiring to capture value](#)
- Nudge: [AI Adoption Curve](#)

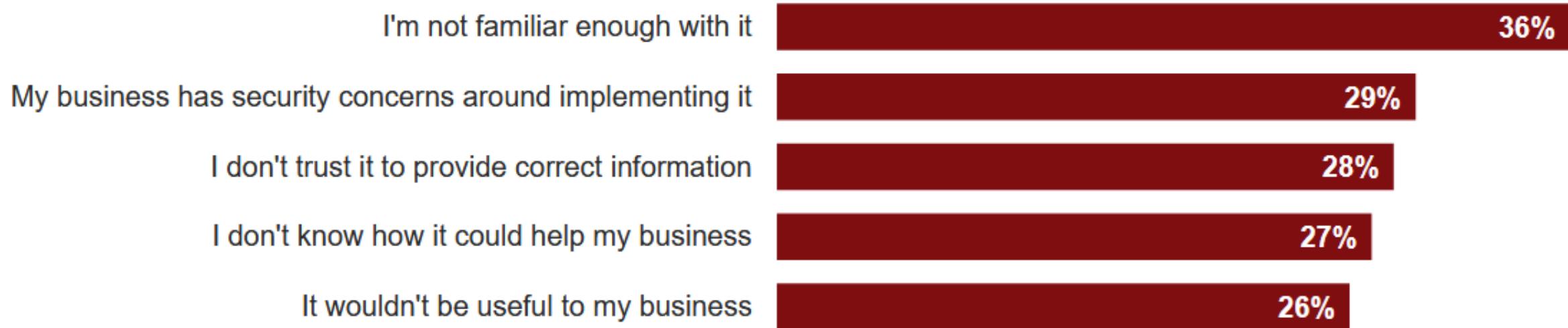
# Verizon State of Small Business Survey 2025

## USAGE OF AI

- My business currently uses AI solutions
- My business does not currently use AI solutions, but is aware of how they could support the business
- My business does not currently use AI solutions and is not aware of how they could support the business
- Don't know / No opinion



# Why Does Your Business Not Use AI?



# What's new and what's next: How small business owners are using AI



## How small business owners are learning about AI

AI is evolving quickly — so how are small business owners learning about the technology and keeping up?

**The most common resources** small business owners said they have used to learn about AI include podcasts or videos, online forums, and social media. Trial and error (aka learning by doing) was also a common approach.

**AXIOS**

Mar 11, 2025

■ Strongly agree ■ Agree ■ Neither agree nor disagree ■ Disagree ■ Strongly disagree

My organization expects generative AI to help accelerate the software development cycle



We aren't sure if any employees are currently accessing generative AI sites today or what they are doing on these sites



Source: Enterprise Strategy Group, a division of TechTarget, Inc.

# What This Workshop Is Not

- A technical guide for coding AI solutions

# What This Workshop Is

A scenario-based walkthrough of a (fictional) small company's growing awareness of AI risk:

- A survey of AI-related risks.
- An opportunity to discuss together difficult problems we all face.
- A picture of how many companies actually run a security program.

A tale that may be exemplary or cautionary. You'll have to decide.

# Why Do It This way?

- Situate AI risk in concrete situations, not abstract lists.
- Consider how to act when standards don't yet exist.
- Companies don't publish their partial fixes and hard tradeoffs—but that's where the most useful lessons often lie.



**Once upon  
a time...**



- LMS for professional education
- SaaS platform on AWS
- ≈25 staff
- No security or AI experts
- SOC 2

A customer asks a question...

# **PRELUDE**

# RFP From BigBux

...

## **4.4.2. Information Security**

- a. List your current security certifications (e.g., ISO 27001, SOC 2 Type II).
- b. Provide a recent penetration test summary or redacted report.

...

## **4.4.3. Artificial Intelligence Governance**

- a. Does your organization use AI in the product? If so, please describe the use cases.
- b. **Do you have an internal AI governance policy?** If yes, please provide a summary or table of contents.

...



Maxine Powers  
CEO

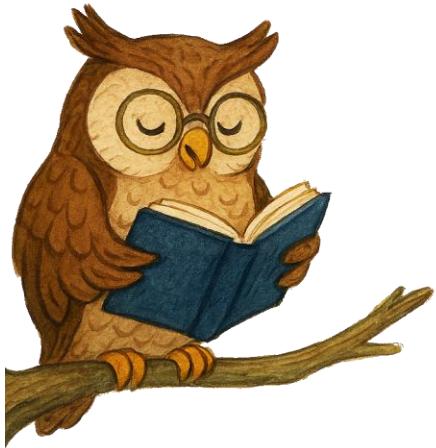


Archie Tech  
CTO

*BigBux asks if we have an AI policy. Do we?*

*No. We govern our AI by not having any.*

*Let's make one so we can say Yes.*



# AI Policy Examples

- Drata Policy & Plan Guidance
  - No AI content as of September 2025
- SANS Security Policy Project
  - Artificial Intelligence Acceptable Use
  - 14 pages
- ISACA Policy Template Toolkit
  - Artificial Intelligence (AI) Acceptable Use
  - Archie's not a member



Archie Tech  
CTO



Drew Diligence  
Counsel

*I wrote: 'MindPath is committed to using AI fairly.' Does that sound governance-y enough?"*

*Add a line about reviewing AI use with the security officer. That's you.*

*Right. So I just talk to myself if it ever comes up?*

# AI Governance Policy



## Scope

This policy applies to all personnel, including employees and contractors.

## Responsible Use

MindPath is committed to using artificial intelligence (AI) in ways that are fair, ethical, and compliant with applicable laws and regulations.

## Product Use Requires Approval

Any use of AI in MindPath's products or services must be reviewed and approved in advance by the Security Officer.

## Policy Review

This policy will be reviewed at least once per year, or sooner if there are significant changes in AI-related risks.

# AI: Governed!





Has Archie addressed the problem?

# PRO

# CON

- Commitment to fairness and compliance
- Gate for use of AI in product
- Accountable role
- Periodic policy review

- Ignores AI outside of product.
- May not satisfy BigBux.
- No defined process.
  - No artifact of compliance
  - Efficacy uncertain
- “AI” is very broad...
- Treats AI as a technology owned solely by CTO.
- Annual review may not suffice.

# What Makes Good Governance?

<b>Awareness</b>	Did they spot and prioritize the real risks?
<b>Effectiveness</b>	Did they make things safer?
<b>Efficiency</b>	Was the cost and effort proportional to the benefit?
<b>Fit</b>	Did it suit the company's culture, size, and maturity?
<b>Assurance</b>	Does it align with best practices? Is it auditable?



# Generate Your AI Usage Policy

in minutes

Tailor a professional, governance-ready AI policy for your organization. Built by experts, customized for your needs.

Start Building →



Published Sep 4 2025: <https://ai-policy-studio.com/>



A developer debugs some code...

# A MISHAP



# Transcribio

*We provide fast, accurate audio transcription to support clear communication, accessible content, and professional workflows.*



Cody Commit  
Software Engineer



#dev-eng

[Messages](#) [Files](#) [Pins](#) +**Cody Commit**

Tuesday, April 22nd ▾

Hey y'all—heads up on the video transcription bug we were seeing! Turns out the issue was with the way we were passing the audio url to Transcribio. The signed URL was expiring before the job kicked off. I threw a minimal repro into ChatGPT and it totally nailed it. Here's the snippet:

```
transcription_request = {
    "audio_url": "https://videos.mindpath.io/p/4839.mp4?e=1714526400&s=abf82c7e",
    "language": "en-US",
}
headers = {"Authorization": "Bearer sk_prod_23af20c8f4c14b1a90f88f8d0a9e"}
response = requests.post("https://api.transcribio.com/v1/transcribe",
    json=transcription_request, headers=headers)
log(response.status_code)
```

# Secure Coding Policy

## Managing Secrets

Secrets include private encryption keys as well as authentication credentials. Access to such secrets must be governed strictly according to the Principle of Least Privilege, ensuring that only people with a legitimate business need can know what the secrets are.





# Incident Report

<b>Severity</b>	Low
<b>Description</b>	External API auth secret exposed over the web to an external company and in internal Slack.
<b>Details</b>	Developer pasted code containing an API auth secret into ChatGPT for debugging assistance. Secret could have been viewed by OpenAI employees and may persist in OpenAI storage and logs. Could also be used in AI training.
<b>Remediation</b>	Transcribio invalidated our auth credential and issued a new one which we deployed it on the same day. Transcribio confirms no one sent unauthorized work using the old API key before it was invalidated.  Met with engineers to remind them of Secure Coding Policy.



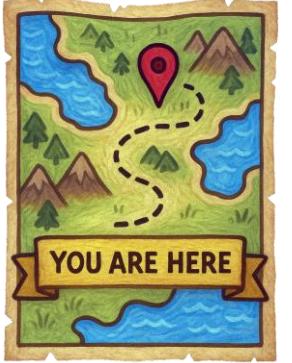
Would you rate that incident Low?

# PRO

# CON

- Incident contained
- Incident artifact created
- Staff reminded of responsibility not to share secrets

- No monitoring or auditing to prevent a recurrence
- Staff may still be sharing other sensitive data with AI
- Unassessed risk.



# Is Training Data Extraction a Thing?

Dropbox...demonstrated extraction of memorized training data from both GPT-3.5 and GPT-4.

- Bye Bye Bye...: Evolution of Repeated Token Attacks on ChatGPT Models  
*Breitenbach & Wood, Dropbox, 2024*

...for non-targeted PII extraction, the attack success rate reaches 48.9%, extracting one authentic PII per two queries at a cost of \$0.012 per PII.

- Effective PII Extraction from LLMs through Augmented Few-Shot Learning  
*Cheng et. al., Arxiv.org, 2025*

In its suit, the Times alleges that, when prompted by users, ChatGPT sometimes spits out portions of its articles verbatim...

- ChatNYT, Rachel Reed, Harvard Law Today, 2024

# “From Payrolls to Patents: The Spectrum of Data Leaked Into GenAI”

We analyzed tens of thousands of prompts going into ChatGPT, Copilot, Gemini, Claude, and Perplexity...in Q4 2024.

8.5% of prompts into GenAI include sensitive data.



Type	Frequency
Customer Data	45.77%
Employee Data	26.83%
Legal and Finance	14.88%
Security	6.88%
Sensitive Code	5.64%

harmonic

# 2025 Updates

- Prompts with sensitive data decreased to 4.37%
- 26% of those went through free ChatGPT.
- On average, 23 new GenAI tools adopted by employees



# Risk Register

Risk	Description	Likelihood	Severity	Risk Level
Unmanaged AI Adoption	Well-meaning staff adopt AI tools without review and share data with them, introducing a new risk of data exposure along with others including AI hallucinations, data exposure, and loss of oversight.	High	Medium	High

Archie goes exploring.

# RECONNAISSANCE





**To:**  
**Subject:**

All Staff

Help Us Understand AI Use at MindPath

Hi everyone,

As AI tools become more common, it's important we understand how they're being used at MindPath—especially as individuals explore them on their own.

If you've used any AI-powered tools (like ChatGPT, GitHub Copilot, or others) for work-related tasks, please let me know. I just want to get a clear picture so we can think through the opportunities and risks together.

Thanks,

Archie Tech, CTO

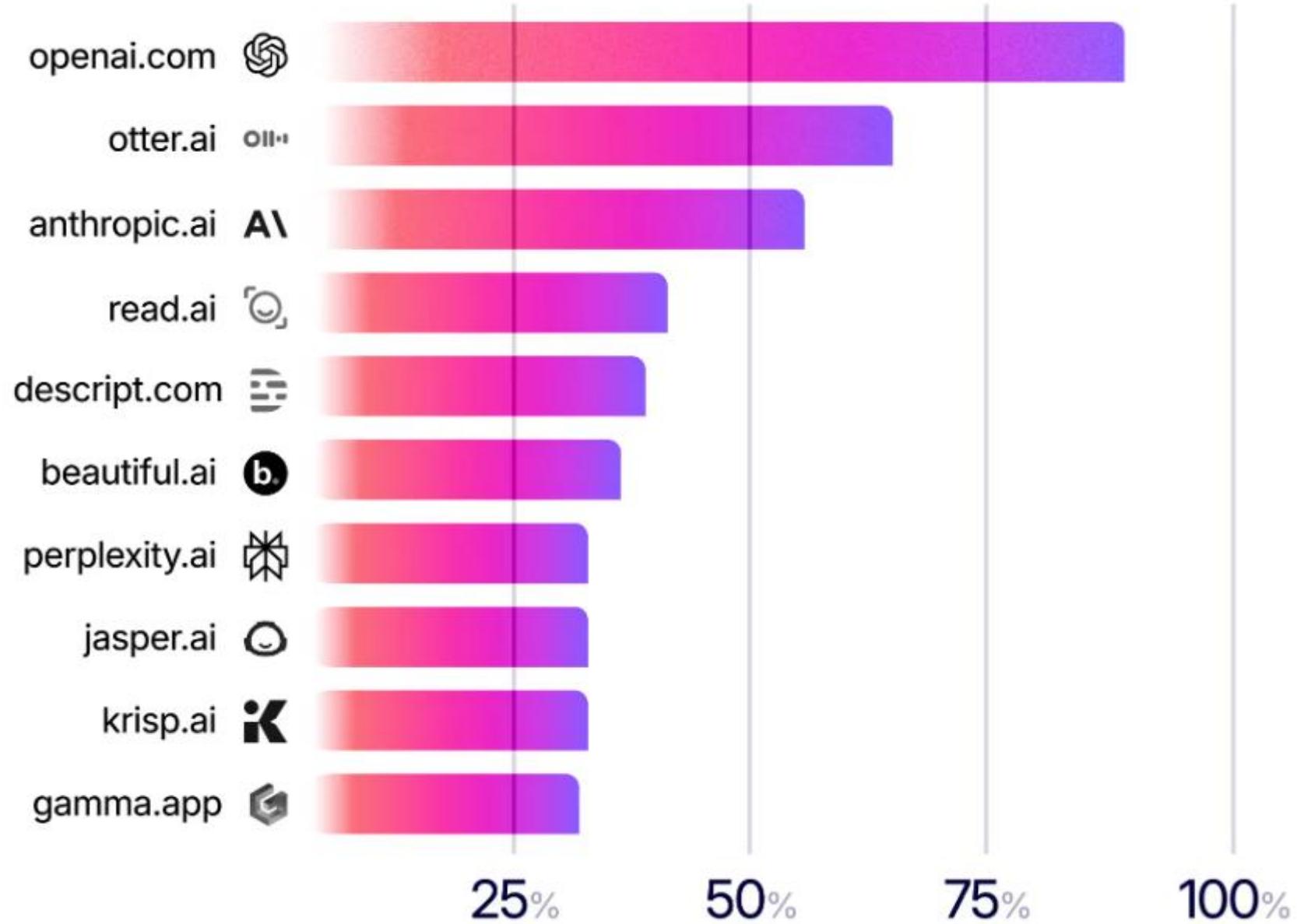
# Growth in unique AI tools discovered

nudge



# Top 10 most-adopted AI tools

nudge



Percent of organizations that have adopted popular AI SaaS tools, based on product data from Nudge Security

10/22/2024



[GO TO OVERVIEW](#)

# Half of all employees are Shadow AI users, new study finds

- ↗ 75% of knowledge workers already use AI
- ↗ 46% wouldn't give it up, even if it were banned

# Inventory of AI Use Cases

Role	Task	AI Tool
Developer	Debugging code	ChatGPT
CTO	Drafting security policies	Claude
Various Staff	Making memes	DALL·E
HR	Drafting interview rejections	ChatGPT
Intern	Reformatting webinar transcript	Wordtune



# Trust, Attitudes and Use of Artificial Intelligence (2025)

48% fear being left behind if they do not use AI

48% report having uploaded sensitive info to public AI tools

66% have relied on AI without critically evaluating info it provides

57% of employees admit not being transparent about their use of AI

63% have seen or heard other employees using AI in inappropriate ways

At your work, how often have you...

% Never    % Rarely    % Sometimes to very often

### Contravening policies

Uploaded copyrighted material or IP to a Gen AI tool

51    15    34

Uploaded company information into a public AI tool

52    14    34

Used AI in ways that contravene policies or guidelines

56    13    31

### Ethically ambiguous

Seen or heard of people using AI tools inappropriately

37    20    43

Used AI tools at work without knowing whether it is allowed

44    18    38

Used AI tools in ways that could be considered inappropriate

53    16    31

### Non-transparent use

Avoided revealing when you've used AI tools in your work

39    19    42

Presented AI-generated content as your own

45    16    39

### Quality issues

Put less effort into your work knowing you can rely on AI

28    21    51

Relied on AI output without evaluating the information

34    24    42

Made mistakes in your work due to AI

44    25    31

# Chasing Shadows: Understanding and Managing Shadow AI



Today, 75% of knowledge workers already use AI, which is set to rise to 90% in the near future. The surprising thing is that more than 50% of this group are using personal or otherwise non-company issued tools. More surprising still is that half of these employees are so attached to such tools that, even if their company banned their use, they would still continue using them.

'Tis magic,  
magic that  
hath  
ravished  
me.

*Doctor Faustus*  
*Christopher Marlowe*  
(painting by Siberdt)





**To:**  
**Subject:**

All Staff  
Lunch & Learn: Show Off Your AI Wins!

Let's have a Lunch & Learn meeting to share how we're using AI in our work. At the first session, I'll show two things I've done:

- Used AI to draft a client presentation outline
- Summarized a dense industry report to spot trends

If you've used AI for anything — writing, research, coding, brainstorming — come share! Big or small, it's all welcome.

Bring your lunch and your ideas! Let's keep MindPath on the cutting edge.

Maxine Powers, CEO

# Inventory of AI Use Cases (v2)

1	Role	Task	AI Tool Used
2	Developer	Debugging code	ChatGPT
3	Full-stack Developer	Creating API documentation	ChatGPT
4	Instructional Designer	Converting client content into learning materials	ChatGPT
5	SDR	Personalizing outreach emails	ChatGPT
6	Support Agent	Drafting polite rejection messages	ChatGPT
7	Product Manager	Mocking up AI feature slides	ChatGPT
8	Operations Manager	Creating onboarding checklist	ChatGPT
9	Team Lead	Writing performance feedback	ChatGPT
10	Backend Developer	Debugging race condition in auth logic	ChatGPT
11	Fractional CFO	Summarizing board packet financials	ChatGPT via Sheets
12	CTO	Drafting security policies	Claude
13	Account Manager	Summarizing feedback	Claude
14	Implementation Specialist	Creating training flow examples	Claude
15	Customer Marketing	Creating customer quote snippets	Copy.ai
16	Various Staff	Making memes	DALL-E
17	Content Team	Translating modules	DeepL
18	Learning Consultant	Summarizing educational research	Elicit
19	Ad hoc Staff	Slide deck outlines	Gamma App
20	Customer Success Manager	Summarizing onboarding docs	Gemini in Google Docs

1	Role	Task	AI Tool Used
21	QA Engineer	Writing Cypress tests	GitHub Copilot
22	Google Docs User	Accepted summary suggestion	Google Workspace
23	All Staff	Spelling and grammar in Docs	Grammarly
24	Content Editor	Rewording quiz questions	GrammarlyGO
25	Legal Consultant	Reviewing AI contract clauses	Harvey AI
26	Marketing Lead	Writing SEO blog drafts	Jasper
27	HR	Drafting interview rejections	ChatGPT
28	Sales Team	Brainstorming value props	Notion AI
29	Product Manager	Drafting user stories	Notion AI
30	UX Designer	Exploring tone for error messages	Perplexity AI
31	Product Manager	Comparing competitor roadmaps	Perplexity AI
32	Multiple Roles	Researching competitors, trends, background	Perplexity AI
33	Intern	Reformatting webinar transcript	Wordtune
34	Multiple Developers	Writing and debugging code	ChatGPT
35	Multiple Developers	Autocompleting code, writing tests, summarizing requirements	GitHub Copilot (IDE)
36	Marketing Intern	Update ethics course content	ChatGPT
37	Customer Success Manager	"get the vibe" of user feedback	Sentiment Analysis
38	Product Manager	product roadmaps	Notion AI
39	Marketing	ad copy	Jasper





Archie scrambles to establish order.

# ASSERTING CONTROL



# Updated AI Governance Policy



Policy Element	Summary
Usage Restrictions	Only approved tools and use cases are allowed.
Approved Tools & Uses	The Security Officer publishes an <a href="#">inventory of approved use</a> on the wiki.
Requesting New Use Cases	Submit a <a href="#">request form</a> to the security team for approval of new use cases.
Transparency	Staff shall disclose when AI is used in decision-making processes.
Training	Annual staff training shall include AI risk awareness.
Oversight	The <a href="#">AI Oversight Committee</a> reviews this policy quarterly.

# AI Use Case Approval Request

Tool Name: \_\_\_\_\_

Vendor Name: \_\_\_\_\_

Tool Website: \_\_\_\_\_

What do you want the AI tool to do for you?

---

---

Describe the kind(s) of data to be shared:

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Data Classification (check all that apply):

Public  Internal  Confidential  Restricted

Expected Benefit: \_\_\_\_\_

Estimated Impact:  Low  Medium  High



# AI Oversight Committee



CEO  
Maxine Powers



CTO  
Archie Tech



VP of Product  
Mark Ketter



How confident are you that  
MindPath now has shadow AI  
under control?

## PRO

- A big step forward in awareness
- Addresses risk of AI in the office
- Cross-department oversight
- Quarterly policy review
- Meaningful gates
- Auditable inventory process
- Training to address culture

## CON

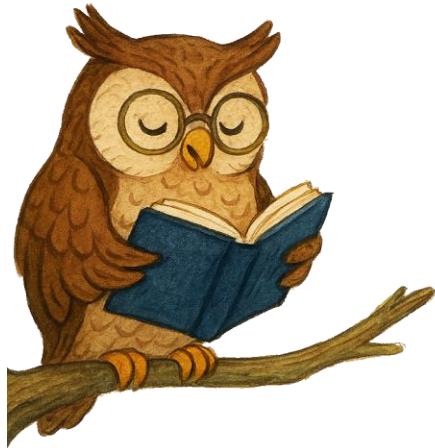
- Self-reporting tool usage. Will people report?
- No detection of unapproved tool use.
- Does security team know enough to assess AI vendor/tool risk?





Archie expands his horizons.

## IMPLEMENTING THE NEW CONTROLS



# Resources: AI Risk Standards

NIST AI RMF 100-1

Artificial Intelligence Risk Management Framework (48pp)

NIST AI 600-1

“Artificial Intelligence Risk Management Framework: Generative Artificial Intelligence Profile” (64pp)

Cloud Security Alliance (CSA)

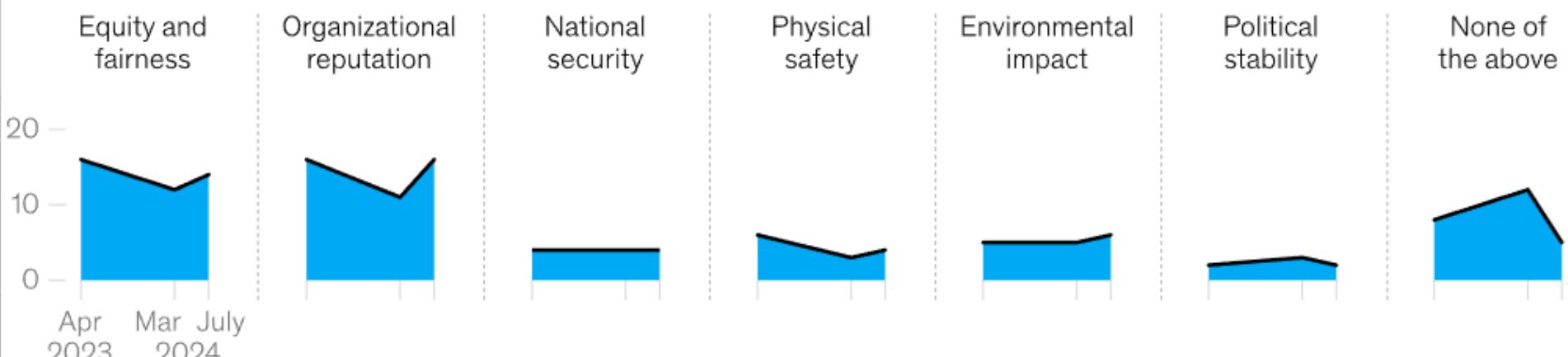
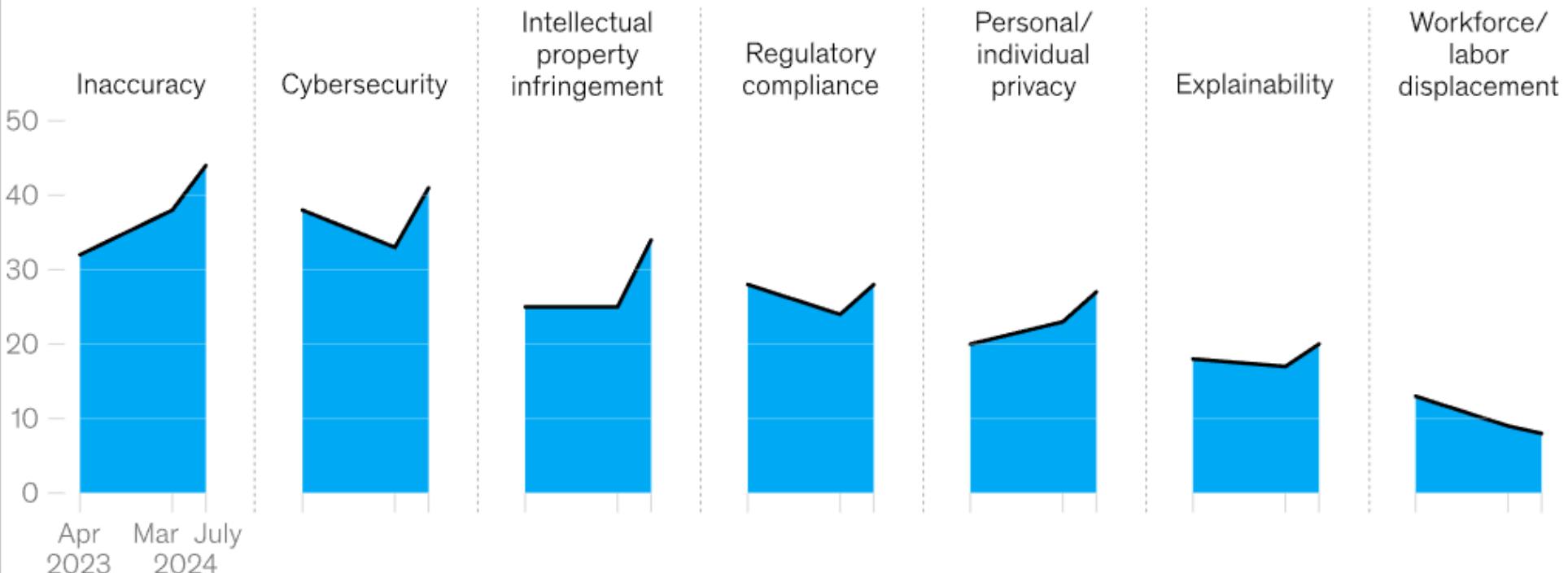
SaaS AI-Risk for Mid-Market Organizations 2025 Survey Report

Software AG

Chasing Shadows: Understanding and Managing Shadow AI

# AI Risks

## Gen-AI-related risks that organizations are working to mitigate,<sup>1</sup> % of respondents



<sup>1</sup>Only asked of respondents whose organizations use AI in at least 1 business function. Respondents who said “don’t know/not applicable” are not shown.  
Source: McKinsey Global Surveys on the state of AI, 2023–24



Bias Amplification      Calibration      Jailbreaks      Emergent Behavior      Explainability

Resource Use Risks      Resilience      Synthetic Content      Model Openness

Prompt Injection      Synthetic Content      Jailbreaks      MemORIZATION AND Leakage

Promt Injection      Model Openness      Resource Use Risks      Model Openness

# Risk Register Updates



Risk	Description	Likelihood	Severity	Risk Level
Overconfidence in AI	AI output needs review even though it appears polished.	High	High	Critical
Shadow AI	Staff share company data with unvetted vendors	High	High	Critical
Insufficient AI Literacy	Staff may overtrust or underutilize AI due to lack of training. Result: poor decisions, missed opportunities, errors.	High	Medium	High
Tool Dependence w/o Continuity Plan	Teams rely on unstable or free AI tools, sometimes even for critical functions.	High	Medium	High
Inconsistent Customer Experience	Informal AI use causes tone, quality, or accuracy differences in customer-facing communications.	High	Low	Medium
License & Attribution Violations	AI output may contain copyrighted or licensed content.	Medium	Medium	Medium
Bias in AI Outputs	AI may generate biased or unfair results	Low	Low	Low

# AI Oversight Committee



CEO  
Maxine Powers



CTO  
Archie Tech



VP of Product  
Mark Ketter



Task	Assigned To	Progress	Start	End
<strong>AI Use Case Inventory</strong>				
Update policy to allow only approved AI use cases	Archie Tech	100%	5/8/25	5/7/25
Create inventory of all current AI use cases	Archie Tech	100%	4/15/25	5/1/25
Assess risk for existing AI use cases	Archie Tech	0%	5/7/25	5/14/25
Review vendors and licensing for desirable AI use cases	Archie Tech	0%	5/14/25	5/31/25
Publish inventory of approved AI use cases	Archie Tech	0%	5/31/25	6/7/25
<strong>AI Literacy Training</strong>				
Update Data Classification Policy	Archie Tech	0%	5/8/25	5/12/25
Create training slide deck	Ruby Rails	0%	5/10/25	5/15/25
Deliver training to all staff	Ruby Rails	0%	5/15/25	5/18/25



Archie faces the hydra.

## EVALUATING 18 VENDORS



Archie Tech  
CTO



Ruby Rails  
Lead Engineer

*Eighteen AI vendors. Eighteen reviews.*

*Eighteen headaches.*

*I'll get the emergency chocolate.*

# Guidance to Security



Criteria	Public	Internal	Confidential	Restricted
Light vendor review	N/A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Full vendor review	N/A		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Executive approval	N/A			<input checked="" type="checkbox"/>

# Light Vendor Review



Issue	Green Flags	Red Flags
<b>Vendor reputation and history</b>	Years in business Well-known customers	Fresh startup History of security incidents
<b>Data ownership</b>	You retain ownership of your content	Vendor has rights to use, modify, or commercialize...
<b>Data training usage</b>	Data not used for model training	Automatic use for model training
<b>Specific security commitments</b>	Third-party audits, encryption, pen tests...	"We take reasonable measures..."
<b>Data retention / deletion</b>	Your data is not retained Your data is purged after <30 days Your data is deleted on request	Data retained longer than necessary

# Full Vendor Review



- Security documentation (white papers, audit reports)
- Vendor questionnaire
- License/contract terms: DPAs, SLAs, audit rights
- Breach reporting terms
- Privacy policy
- Data residency and sovereignty
- Integration/deployment details
- Direct audit (if needed)

# Vendor Reviews

Vendor	Reputation	Data Ownership	Training Use	Security Certs	Data Retention	Notes	Risk	Review Date
OpenAI (Teams license)	Established	Protected in business tier	Business tier opt-out	SOC 2	Configurable	This risk rating assumes a business account.	Low	5/3/2025 Archie Tech
Theta	Early-stage	Vendor gets broad rights	No opt-out	None listed	Unclear	No certs; indefinite retention possible	High	5/4/2025 Ruby Rails
Garnet	Growing	Protected in business tier	Business tier opt-out	SOC 2	Unclear	Opt-out requires higher plans	Medium	5/5/2025 Ruby Rails

# Inventory of Approved Use Cases



Vendor	Product	Data Shared	Data Classification (Highest)	Vendor Risk	Use Case Risk	Decision	Notes	Reviewer	Date
Any	Any	Anything classified as Public	Public	Any	Low	Allow		Archie Tech	5/7/25
OpenAI	ChatGPT	Source code (with secrets)	Restricted	Low	High	Deny		Archie Tech	5/7/25
OpenAI	ChatGPT	Source code (no secrets)	Confidential	Low	Low	Allow	Must use Teams license	Archie Tech	5/7/25
OpenAI	DALL·E	Staff humor (memes)	Internal	Low	Low	Allow		Ruby Rails	5/8/25
Theta	Theta App	Presentation prep	Confidential	High	Low	Deny	Low confidence in vendor	Ruby Rails	5/8/25

Factor	Large Vendors	Small Vendors
<b>Price</b>	<ul style="list-style-type: none"> <li>More expensive</li> </ul>	<ul style="list-style-type: none"> <li>Less expensive</li> </ul>
<b>Longevity</b>	<ul style="list-style-type: none"> <li>High – stable companies</li> </ul>	<ul style="list-style-type: none"> <li>Low – risk of shutdown/acquisition</li> </ul>
<b>Innovation</b>	<ul style="list-style-type: none"> <li>Less agile</li> </ul>	<ul style="list-style-type: none"> <li>Often lead in niche features</li> </ul>
<b>Security Investment</b>	<ul style="list-style-type: none"> <li>Strong – dedicated infosec teams</li> </ul>	<ul style="list-style-type: none"> <li>Often weak – minimal security staffing</li> </ul>
<b>Incident History</b>	<ul style="list-style-type: none"> <li>Publicly disclosed, structured responses</li> </ul>	<ul style="list-style-type: none"> <li>Sparse or unclear breach history</li> </ul>
<b>Compliance</b>	<ul style="list-style-type: none"> <li>Common (SOC 2, ISO 27001, GDPR)</li> </ul>	<ul style="list-style-type: none"> <li>Fewer certifications</li> </ul>
<b>Input Data Handling</b>	<ul style="list-style-type: none"> <li>Varies. Enterprise plans are better.</li> </ul>	<ul style="list-style-type: none"> <li>Risky – may lack clear data policies</li> <li>More likely to offer on-prem</li> </ul>
<b>Transparency</b>	<ul style="list-style-type: none"> <li>Moderate – polished but opaque</li> </ul>	<ul style="list-style-type: none"> <li>Sometimes higher – open about methods</li> </ul>





## ChatGPT Business License

\$600/month for  
all 25 staff

A third of  
requested use  
cases were for  
this

Some requests  
for other tools  
could be met by  
this

## GitHub Business License

\$120/month for  
six tech staff

Recommended to  
protect source  
code



Would you approve this  
vendor review process for  
your own company?

# PRO

# CON

- Transparent, auditable process
- Cost proportionate to risk
  - Low risk requires no review
  - High risk require full review
- Purchasing accounts should significantly reduce shadow AI

- Light review may miss problems
- Light reviews still take time
- If use case approvals are slow, shadow AI will continue
- Reviews need to be periodic
  - drift, features, regulations...
- Ignores terms of use
- Little verification of vendor claims
- Business continuity

Task	Assigned To	Progress	Start	End
<b>AI Use Case Inventory</b>				
Update policy to allow only approved AI use cases	Archie Tech	100%	5/8/25	5/7/25
Create inventory of all current AI use cases	Archie Tech	100%	4/15/25	5/1/25
Assess risk for existing AI use cases	Archie Tech	0%	5/7/25	5/14/25
Review vendors and licensing for desirable AI use cases	Archie Tech	0%	5/14/25	5/31/25
Publish inventory of approved AI use cases	Archie Tech	0%	5/31/25	6/7/25
<b>AI Literacy Training</b>				
Update Data Classification Policy	Archie Tech	0%	5/8/25	5/12/25
Create training slide deck	Ruby Rails	0%	5/10/25	5/15/25
Deliver training to all staff	Ruby Rails	0%	5/15/25	5/18/25

# Data Classification Policy



Level	Examples	General Handling
Public	Published materials: marketing, blogs, press releases...	Share freely.
Internal	Policies, contact lists, meeting notes, project status...	Share only within MindPath.
Confidential	Contracts, invoices, personnel files, roadmaps, <b>source code without keys or security logic.</b>	Authorized staff only. Store securely.
Restricted	Encryption keys, passwords, <b>source code with security logic</b> , customer data in platform, PII, incident reports...	Strictly limited; highest security.



# Guidance to Staff

**Public** data may be shared with any AI program.

**All other data** (Internal, Confidential, Restricted) may be shared with AI tools **only if** the use matches an **approved use case** listed on the Wiki.

**⚠️ Never upload** Confidential or Restricted data to personal AI accounts, free-tier AI services, or AI services not explicitly approved by the Security Team.

To request approval of new use cases, send a **Request Form** to the Security Team.



# Training Objectives

MindPath supports using AI to improve work.  
Use it responsibly and transparently.

## ◆ **Understand AI Risks**

- AI use may expose sensitive data.
- AI outputs can be unreliable, biased, or hallucinated.

## ◆ **Follow Company Rules**

- Use only approved AI tools and approved use cases.
- To use new tools, first get approval from Security.
- Never use personal AI accounts for Confidential or Restricted data.

## ◆ **Know Your Responsibility**

- You are individually responsible for safe AI use.
- Report any AI-related issues to Security immediately.



If you were a new hire, would this training keep you out of trouble?

# PRO

# CON

- Guidance to staff is simple enough it might work.
- MindPath will probably create engaging training materials. That's their business.

- Will there be periodic refreshers?
- Will the training be online or in person?
- When will the materials be reviewed and updated?
- Potential ambiguity about which code is "Confidential."
- Does not consider ongoing reinforcement

# Recap: Shadow AI

- Catalogued AI in use at the company
- Improved AI policy:
  - inventory of approved AI use cases
  - review process for managing the list
  - executive oversight committee
- Updated the risk register
- Established review criteria for AI tool vendors
- Reviewed vendors currently in use
- Approved specific AI use cases
- Acquired licenses for the most critical tools to reduce risk
- Delivered AI awareness training to staff







A customer reports a problem.

## A NEW WRINKLE



**To:**  
**Subject:**

MindPath Tech Support  
Missing Policy?

I recently completed the “Remote Work Best Practices” module in our LMS. The audio transcript for slide 23 mentions a “Remote Work Policy.” I can’t find that document in either our own policies or your help center. Where is it?

Jon Dough  
SafeHarbor Enterprises



**To:**  
**Subject:**

will.fixit@transcribio.com  
Transcription discrepancy

We found a discrepancy in the transcript for “Remote Work Best Practices.” The transcript for slide 23 mentions a remote work policy, but the original audio does not.

Can you help us understand how this discrepancy occurred?

Paige Scriber  
Content Development Team



**To:** paige.scriber@mindpath.com  
**Subject:** RE: Transcription discrepancy

Apologies for the confusion — we recently updated the AI model we use for transcription, and it appears the new model hallucinated content.

We take this seriously. We're tightening our review and QA processes immediately to catch this type of error before delivery. We're also revalidating recent transcripts.

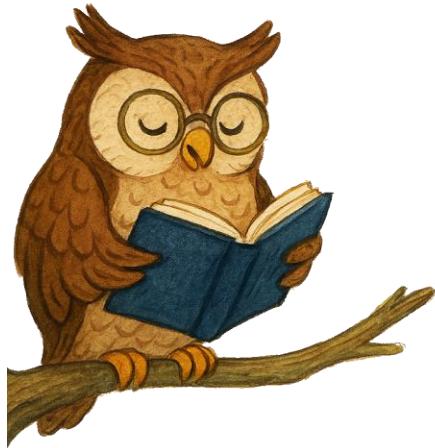
Thanks again for bringing this to our attention — we're committed to getting it right.

Will Fixit  
Transcribio Support

# Incident Report



<b>Severity</b>	Medium
<b>Description</b>	Transcribio AI hallucinated factually incorrect content in a module transcription.
<b>Details</b>	A customer found and reported the error. The situation was resolved quickly and easily, but another incident could be worse.
<b>Remediation</b>	Transcribio is re-validating recent transcriptions and improving its testing and review processes.



# Sub-vendor Incidents

Search

[Search](#)

**CSETv1 (1617) -**

Physical Objects (~947) +

Entertainment Industry (~1401) +

Report, Test, or Study of data (~1511) +

Deployed (~1442) +

Producer Test in Controlled Conditions (~1509) +

Producer Test in Operational Conditions (~1453) +

User Test in Controlled Conditions (~1555) +

User Test in Operational Conditions (~1367) +

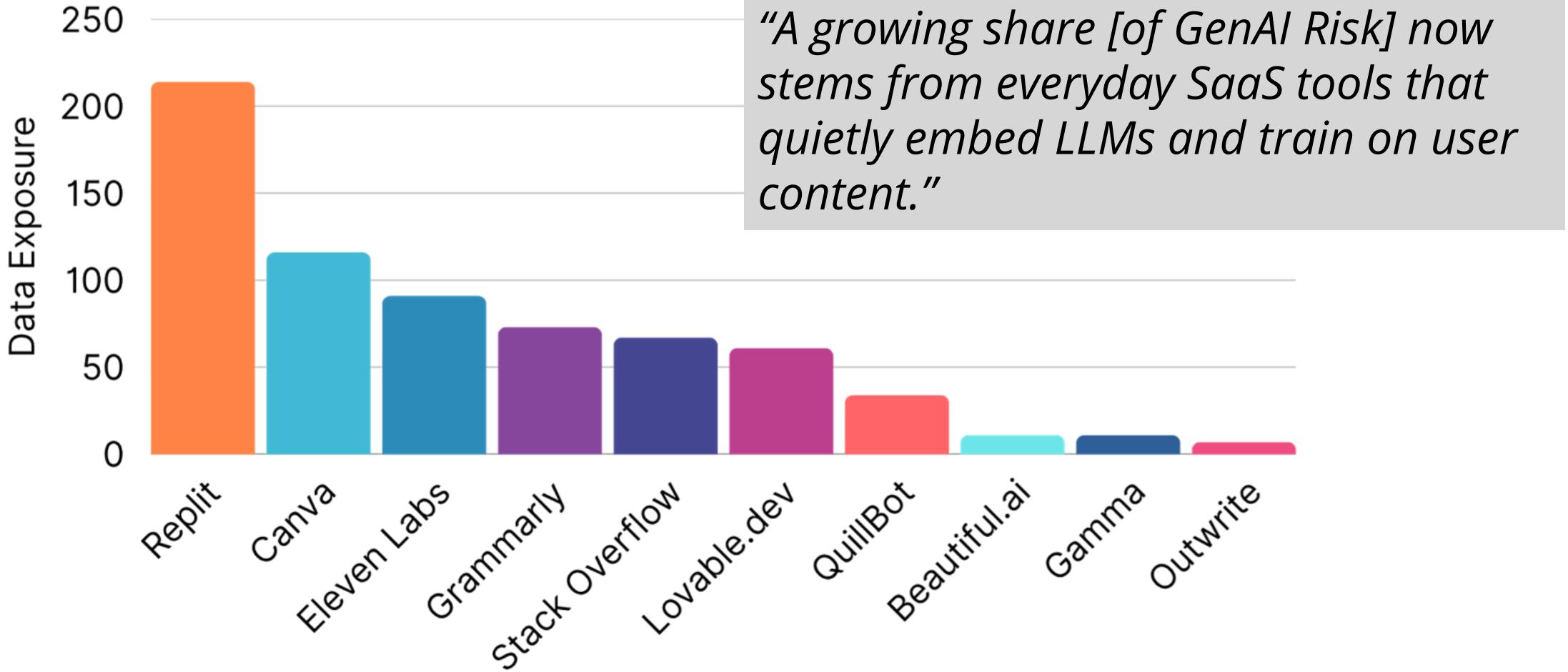
Tangible Harm (~681) +

AI Incident Database  
(incidentdatabase.ai)

# AI Vendor Incidents

Vendor	Company	Description
DeepMind	Royal Free NHS Trust	Unlawful sharing of patient data
Inbenta Technologies	Ticketmaster UK	Chatbot integrated into Ticketmaster payment page was exploited to gain access to customer payment info
GitHub Copilot	Many	Hallucinates exploitably non-existent software packages

# AI is Quietly Embedded in SaaS Tools





# Risk Register

Risk	Description	Likelihood	Severity	Risk Level
AI-injected errors in vendor outputs	AI-generated transcripts or summaries may present customers with false or misleading information. Possible regulatory and contractual problems.	Medium	High	High
Invisible Vendor AI	Vendors may add AI features that alter data flow or risk without notice or review. Possible privacy and contractual problems.	High	High	Critical
Inadequate Contract Terms for Vendor AI	Contracts don't require AI disclosure or give rights to address AI-driven errors.	High	Medium	High
IR Plan ignores AI	Our IR Plan doesn't cover AI-related issues from vendor services.	High	Medium	Medium

# AI Oversight Committee



CEO  
Maxine Powers



CTO  
Archie Tech



VP of Product  
Mark Ketter



Task	Assigned To	Progress	Start	End
<b>Incident Response Plan</b>				
Draft IR revisions taking AI risk into account	Archie Tech	0%	6/1/25	6/30/25
Review with AI Committee	Archie Tech	0%	7/7/25	7/7/25
<b>Vendor Contracts</b>				
Update vendor contract template to address AI issues	Drew Diligence	0%	6/1/25	6/15/25
<b>Vendor Review Process</b>				
Add AI questions to the vendor questionnaire	Archie Tech	0%	6/2/25	6/7/25
Review all existing vendors for AI risk	Archie Tech	0%	6/9/25	7/11/25
Review all existing vendor contracts for AI risk	Drew Diligence	0%	7/14/25	8/14/25



If you were the customer,  
would this incident response  
satisfy you?

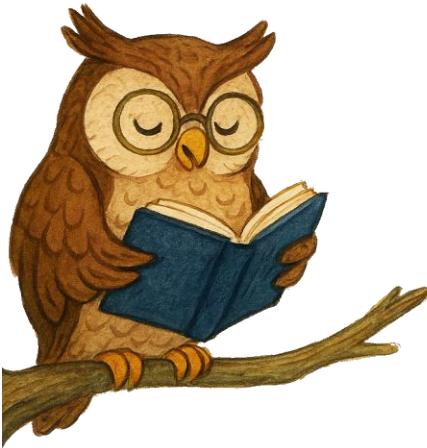
# PRO

# CON

- Followed defined process
  - Analysis, containment, eradication...
  - Written incident report
  - Post mortem analysis
    - New risks acknowledged
    - Mitigations planned
- Problem identified and addressed

- Limited visibility into AI use at vendor
- Minimal assurance it won't happen again
  - “tightening our review and QA”
- No contractual obligations regarding AI use

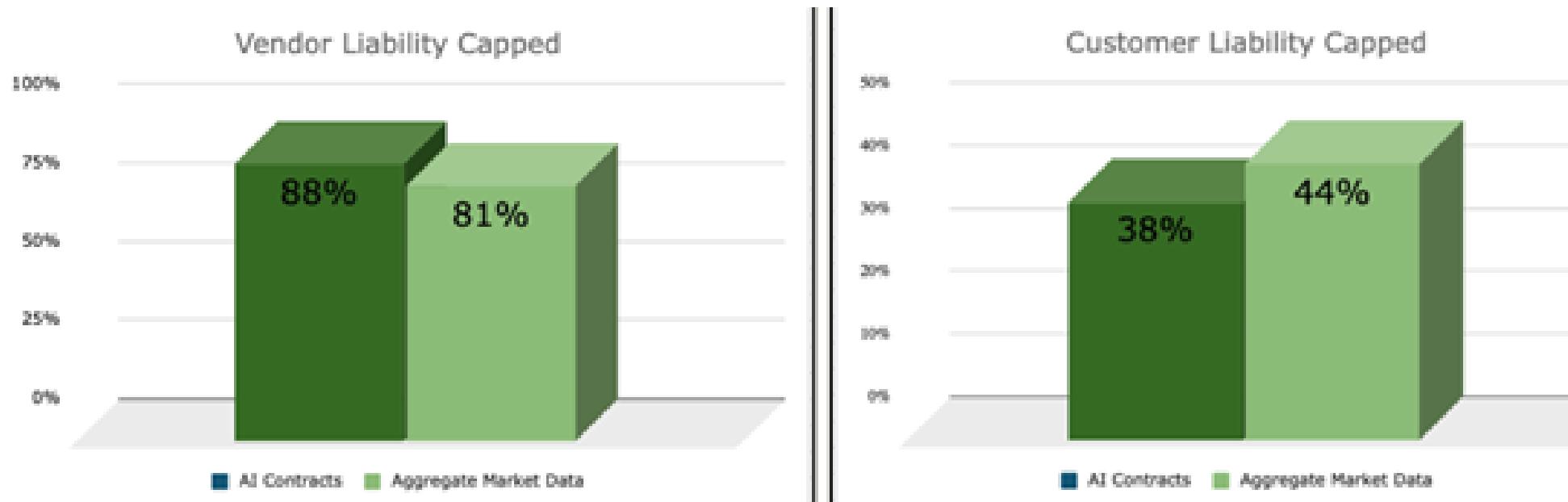
Task	Assigned To	Progress	Start	End
<b>Incident Response Plan</b>				
Draft IR revisions taking AI risk into account	Archie Tech	0%	6/1/25	6/30/25
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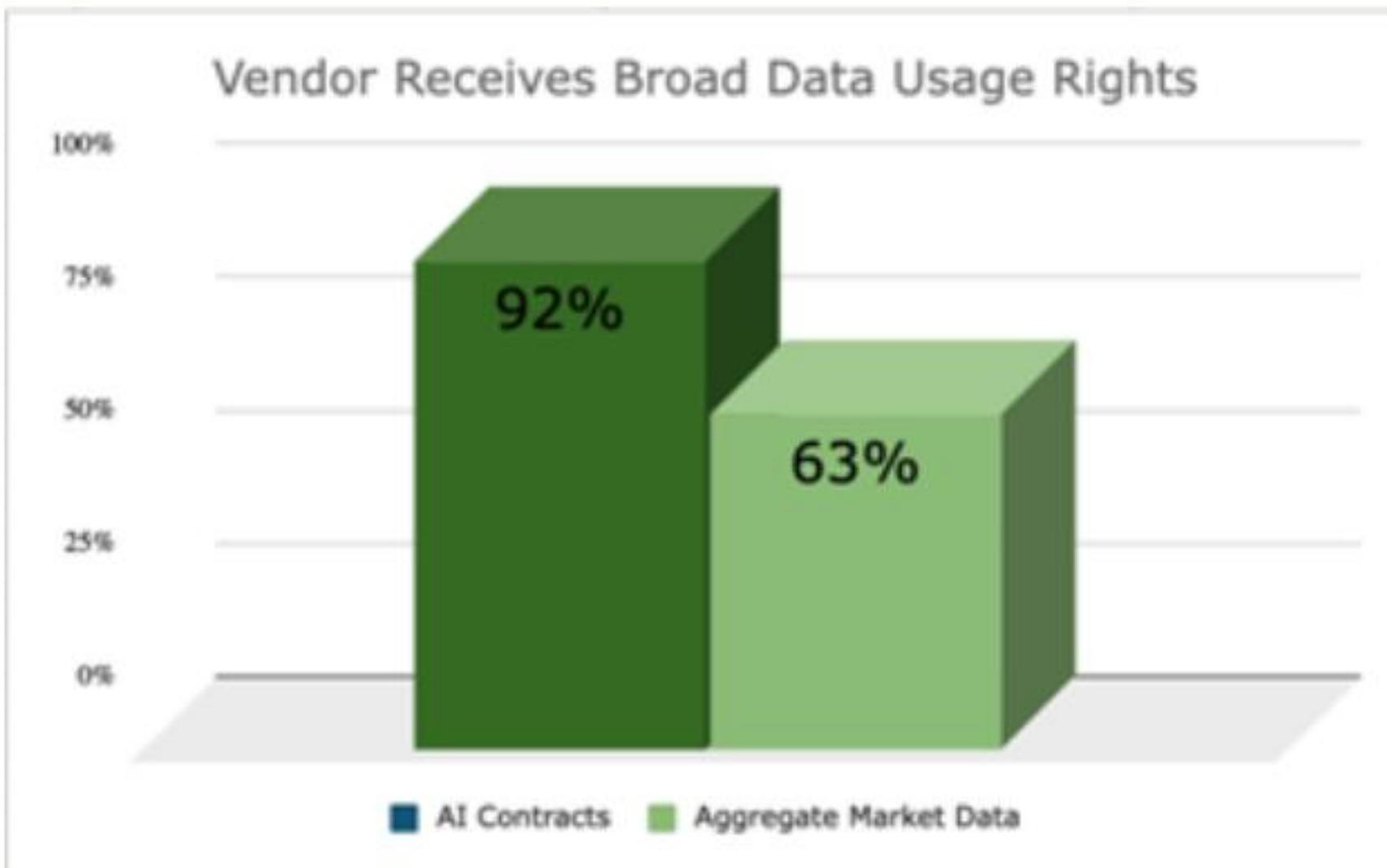
# Contract Resources

Source	Document
World Economic Forum	<a href="#"><u>Adopting AI Responsibly: Guidelines for Procurement of AI Solutions by the Private Sector</u></a>
Lexis Nexis	<a href="#"><u>Artificial Intelligence Agreements Checklist</u></a>
Morgan Lewis	<a href="#"><u>Contracting Pointers for Services Incorporating the Use of AI</u></a>
Stanford Law School	<a href="#"><u>Navigating AI Vendor Contracts</u></a>

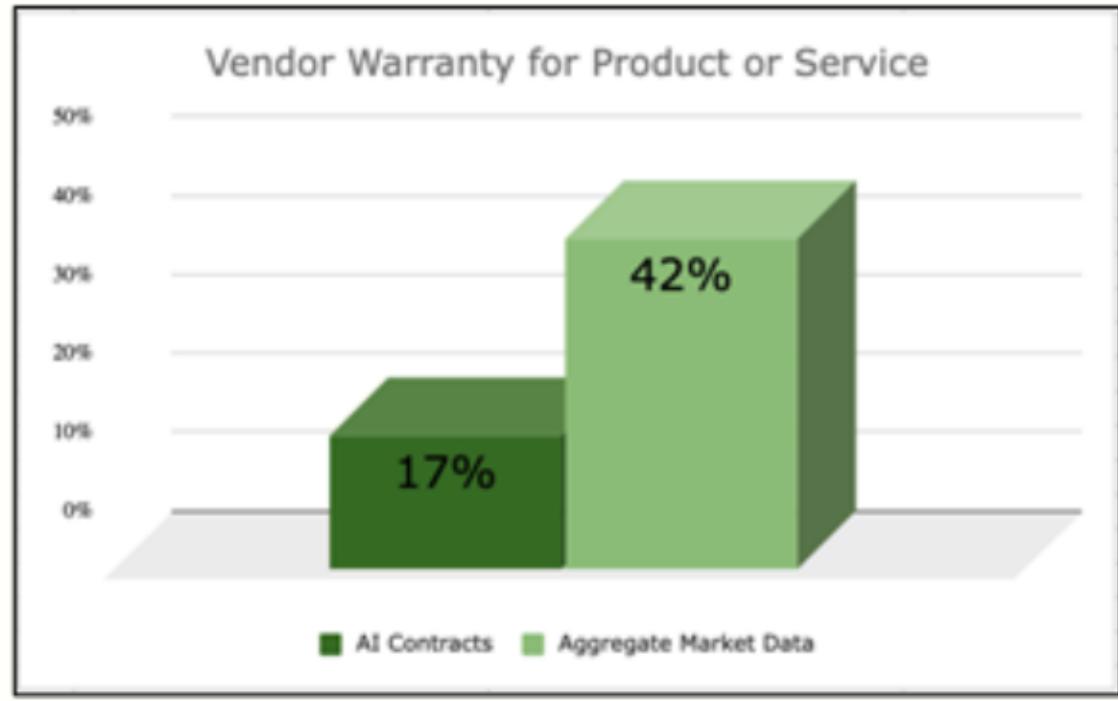
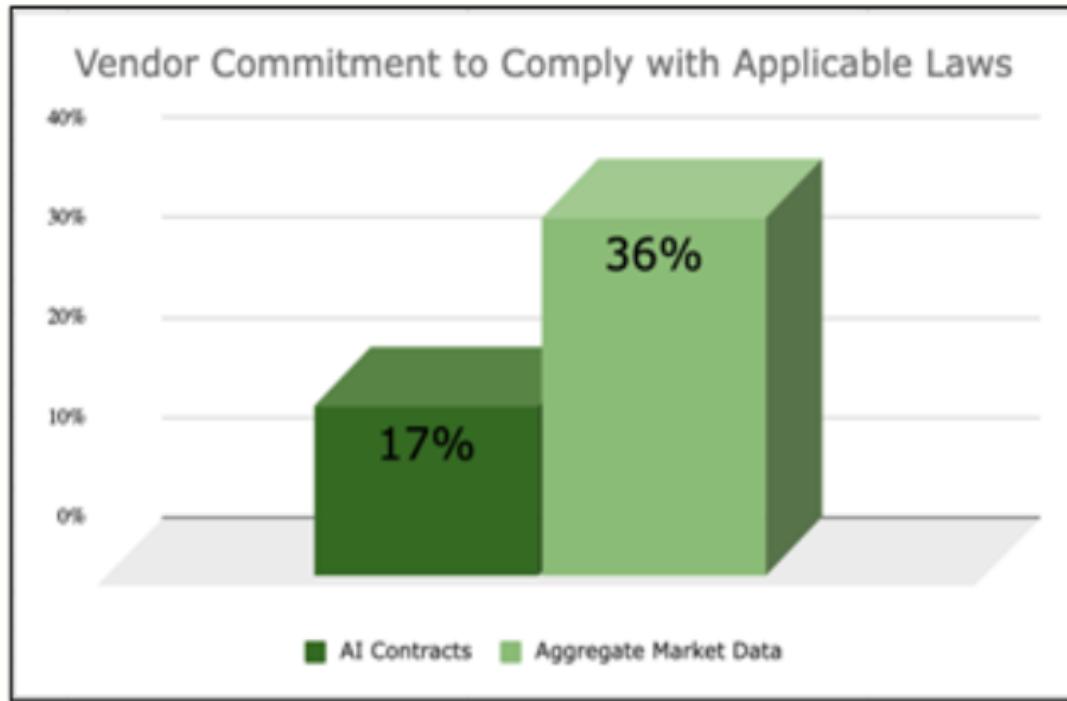
# AI vs SaaS Contract Data



# AI vs SaaS Contract Data



# AI vs SaaS Contract Data



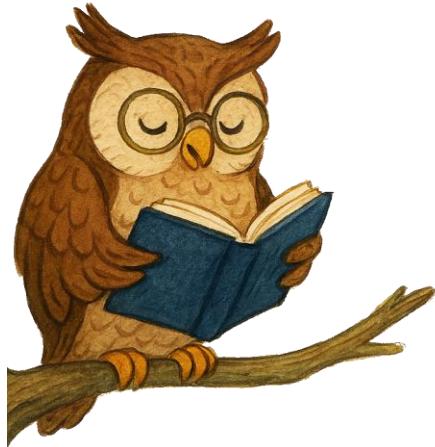
# Contract Concerns



Drew Diligence  
Counsel

Concern	Description
Disclosure of AI Use	Initial and ongoing
Data Usage Restrictions	No training on company data without consent
Security Obligations	Including AI-specific vulnerabilities
Compliance	Privacy, discrimination, consumer protection, emerging AI laws
Incident Notification	Including AI-related causes and breaches
Indemnification	Regulatory fines; third-party claims

Task	Assigned To	Progress	Start	End
<b>Incident Response Plan</b>				
Draft IR revisions taking AI risk into account	Archie Tech	0%	6/1/25	6/30/25
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# AI Vendor Risk

[FS-ISAC](#): Generative AI - Vendor Evaluation and Qualitative Risk Assessment ( $\approx$ 120 questions)

[OneTrust](#): Questions to Add to Existing Vendor Assessments for AI ( $\approx$ 22 questions)

[VenMinder](#): Artificial Intelligence Sample Vendor Questionnaire ( $\approx$ 50 questions)

# Vendor AI Risk Screening

- Do you currently use AI or machine learning in your product or service? If yes, provide details.
- Do you consistently notify customers when AI or machine learning features change?
- Does any of your AI processing involve our data? If yes, provide details including safeguards.
- Is customer data ever used to train, fine-tune, or improve AI models?
- Are any third-party AI services embedded in your product? If yes, identify them and your contractual relation to the provider (business license? enterprise contract? etc.)
- How do you monitor and secure AI components against threats (e.g., data leakage, model vulnerabilities)?
- Can you provide documentation or logs of AI-driven decisions or outputs that affect our data or service?
- Do you have processes to detect and correct AI errors, unintended behavior, and bias?





Is this a good list for MindPath?

# PRO

# CON

- Addresses core risks
    - customer data use
    - sub-vendors
    - AI-powered features
  - Auditable artifact
- 
- Relies on self-reporting
  - Silent AI adoption between reviews may go unnoticed
  - Some questions are very broad and might get hand-wave answers
  - Does not assess
    - human oversight
    - service continuity

Task	Assigned To	Progress	Start	End
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# Incident Response Resources

- [NIST AI RMF 100](#)
- [Guidelines for Secure AI System Development](#)  
National Cyber Security Centre

## Develop incident management procedures



The inevitability of security incidents affecting your AI systems is reflected in your incident response, escalation and remediation plans. Your plans reflect different scenarios and are regularly reassessed as the system and wider research evolves. You store critical company digital resources in offline backups. Responders have been trained to assess and address AI-related incidents. You provide high-quality audit logs and other security features or information to customers and users at no extra charge, to enable their incident response processes.

Preparation

Detection

Analysis

Containment

Eradication

Recovery

Post-Incident Activity

Preparation

Detection

Analysis

Containment

Eradication

Recovery

Post-Incident Activity

# Incident Response Policy Updates

We include AI risk when screening vendors to avoid unreliable partners.

We ensure vendor contracts include obligations for handling incidents responsibly.

We train staff to recognize possible AI-related incidents.

AI-related incidents are reported to the AI Oversight Committee.



# New Training Objectives

- ◆ Understand AI Risks
- ◆ Follow Company Rules
- ◆ Know Your Responsibility
- ◆ Detect and Report AI Incidents

AI Incident Warning Signs:

- Outputs suddenly shift without a product update
- Inconsistent, non-repeatable errors
- Customer or staff reports “weird” results
- Plausible but incorrect content
- Biased or offensive output



# Recap: Risk in Non-AI Vendors

- Incident report
- Risk register
- Project plans
- Contract language
- Vendor assessments
- IR Plan
- Staff training



MindPath takes the next step.

# **FROM RAG TO RICHES**





Wynn Moore  
VP of Growth

# Let's do this!

- Generate courseware from PDFs?
- Adaptive personalized learning paths?
- Conversational tutor with feedback?
- Copilot for course designers?
- Auto-create and score exams?
- Generate interactive scenarios based on content?
- AI mentors personalized for each user?
- Self-evolving content libraries?



Ruby Rails  
Lead Engineer

I love our optimism. It's adorable.

#dev-eng



Messages

Files

Pins

+

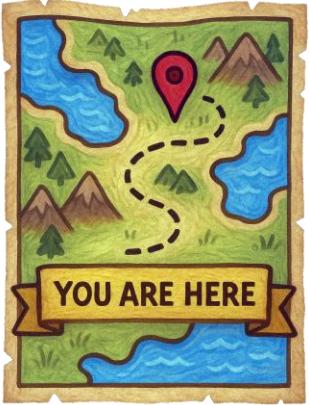
**Ruby Rails**

Tuesday, April 22nd

Hey folks—over the weekend I built a little RAG chatbot (“Fixie Pixie”) trained on my GitHub repos. She:

- Sniffs out forgotten TODOs
- Digs up old project oddities
- Explains mystery utility functions
- Roasts my naming conventions

She’s not production-ready, but she’s already helped me catch some sneaky tech debt. Happy to demo or help you spin up your own gremlin.



**Cory Huff** • 1st

Marketing Operations Leader in Tech, Music,...

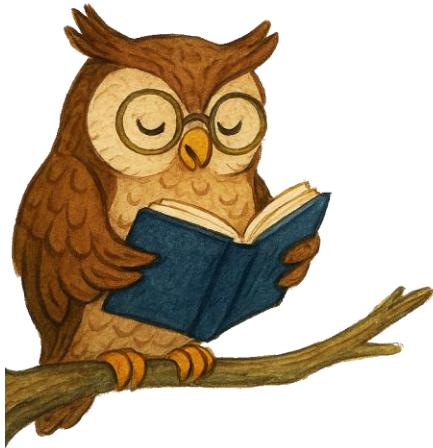
2h •

...

X

I've been building some AI powered chatbots in my spare time, just to learn.

The best one is a bot trained on the IP of a professional coach with decades of published content. We trained it to act like that coach, using their language, frameworks, and methods. It's not perfect, but it is a great companion that people can use between sessions with their coach or therapist, or while working through a course.



# RAG Resources

## Code a Simple RAG from Scratch (Hugging Face, 2024)

A few lines of python code to get “hello world” RAG code running on your own computer.

## Build a RAG App (LangChain, 2024?)

More detailed tutorial example orchestrated with LangChain. Simple version takes about 50 lines of code.

## RAG Techniques (Nir Diamant, 2024/5)

GitHub repo with extensive code examples.

## Guide to RAG Implementations (Armand Ruiz, 2024)

A useful list of RAG variations.

# MindPath's RAG Repo

- Policies
- Employee Handbook
- Product docs & FAQs
- Product plans
- Vendor Contracts
- Customer Contracts
- Tech support docs
- Internal technical docs
- White papers
- Meeting notes
- Training materials
- Release notes
- Internal wiki
- Org charts
- Company newsletters

# Internal Chatbot Project Description

## Purpose

- Increase productivity by helping staff find relevant documents quickly.
- Explore RAG (Retrieval-Augmented Generation) capabilities.

## Out of Scope

- Use of confidential or restricted data
- External or customer-facing deployment

## Tactics

- Keep it simple. Limit risk.

## Success Criteria

- Delivers useful, relevant answers to internal users
- Team gains confidence to plan a customer-facing version later



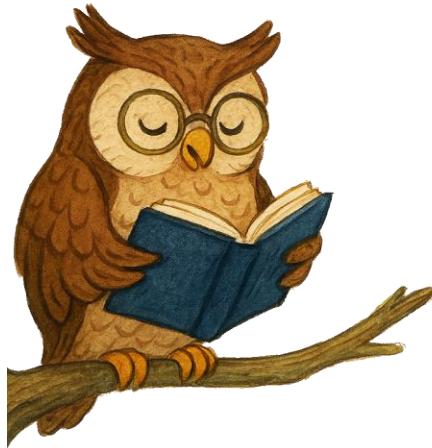
# Internal Chatbot Milestones

Phase	Deliverables
Planning	Define corpus. Decide on tech stack. Document the design.
Architecture Review	Identify risks. Agree on mitigations.
Ingestion Pipeline	Automate creation of document index (with partial corpus)
Chatbot Prototype	Index + basic UI deployed on new secure server
Chatbot MVP	Fill out corpus. Make UI robust and secure.
Beta	Gather and incorporate feedback from limited user set.
Rollout	Roll out to all staff (with training.)

The team considers what might go wrong.

# ARCHITECTURE REVIEW





# RAG Risks

Mitigating Security Risks in Retrieval Augmented Generation (RAG) LLM Applications (CSA, 2023)

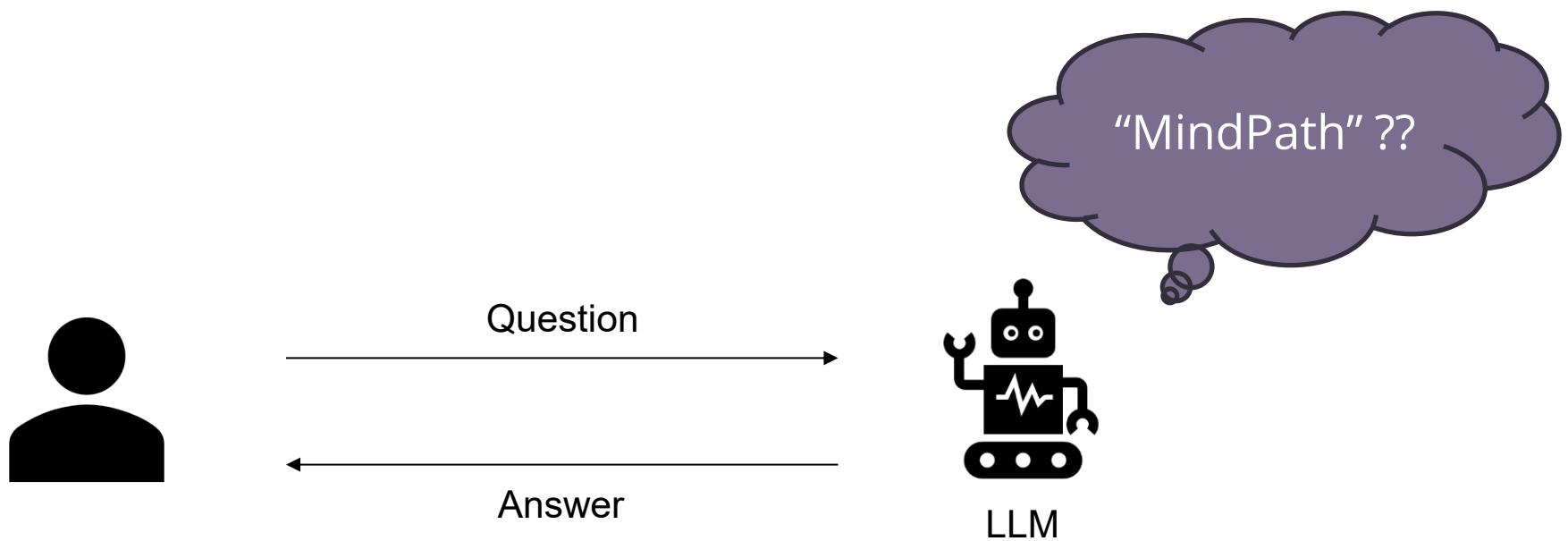
Real AI Safety: Threat Modeling a Retrieval Augmented Generation (RAG) System (Kevin Riggle, 2024)

Security Risks with RAG Architectures (IronCore Labs)

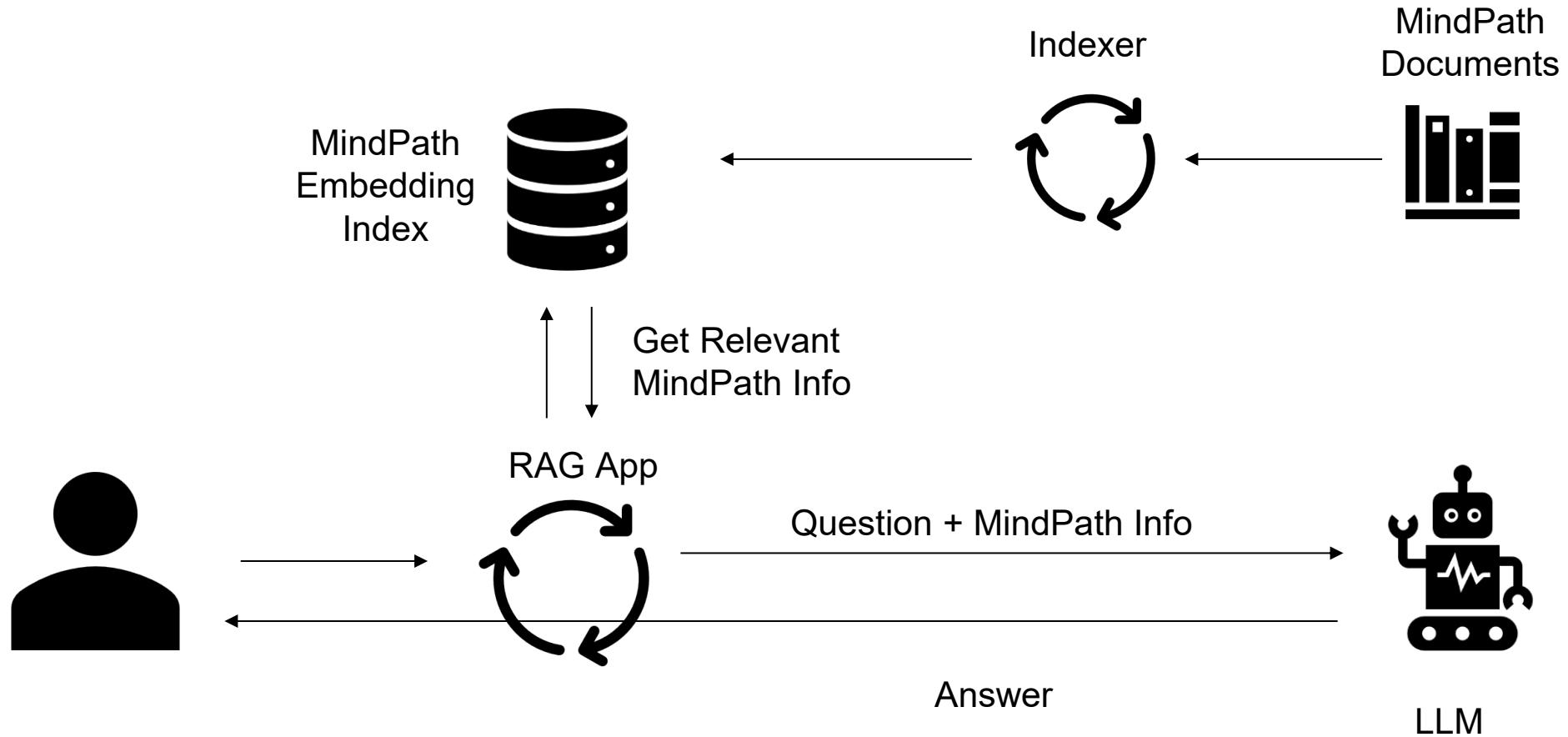
Mastering Threat Modeling for Agentic RAG Architectures on AWS: A STRIDE-Based Guide (Arsh Riz, 2024)

Top 10 Risks for LLMs and Gen AI (OWASP, 2025)

# Normal LLM Interaction



# Retrieval-Augmented Generation (RAG)



# Third-Party RAG Components

Vendor	Product	Function
LangChain Inc	LangChain	Orchestration
Natural Language Processing Group (HKU)	InstructorL	Embedding model
Qdrant Inc	Qdrant	Vector database
Ollama Inc	Ollama	Local LLM host
Stoneforge	Runestone-8B	LLM

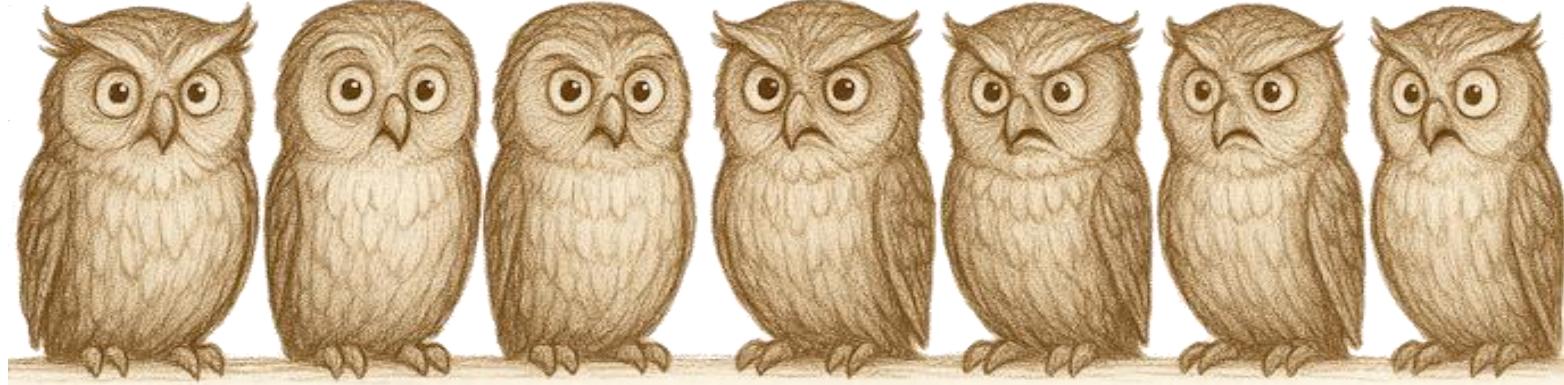
# Inventory of Approved Use Cases



Vendor	Product	Data Shared	Data Classification (Highest)	Vendor Risk	Use Case Risk	Decision	Notes	Reviewer	Date
LangChain Inc	LangChain	Chatbot corpus	Internal	Low	Low	Allow	Hosted locally MIT	Archie Tech	5/15/25
Natural Language Processing Group (HKU)	InstructorL	Chatbot corpus	Internal	Low	Low	Allow	Hosted locally Apache 2.0	Archie Tech	5/15/25
Qdrant Inc	Qdrant	Chatbot corpus	Internal	Low (local)	Low	Allow	Hosted locally Apache 2.0	Archie Tech	5/15/25
Ollama Inc	Ollama	Chatbot corpus	Internal	Low	Low	Allow	Hosted locally MIT	Archie Tech	5/15/25
Stoneforge	Runestone-8B	Chatbot corpus	Internal	Low	Low	Allow	Hosted locally Apache 2.0	Archie Tech	5/15/25

Vulnerability	Consequences	Treatment
Hallucinations	False/misleading answers	UI disclaimer. User education.
Out-of-date documents	False/misleading answers	Automate ingestion. Encourage corpus clean-up.
Corrupted data sources	False/misleading answers	Secure the infrastructure.
Testing non-deterministic system	Unpredictable bot behavior	Manual tests. Remaining risk accepted.
Input corpus unmanaged	False or misleading answers Sensitive data exposure	Ingest only non-sensitive data. Encourage corpus clean-up.
Insider threat	All of the above	Secure the infrastructure. Remaining risk accepted.
Untraceable behavior	Hinders investigation.	Log time, user, input, response.
Prompt injection; Embedding leakage; Trust misalignment.	Various	Accepted. (Internal use only.)
Rush to productize	Serious harm if exposed externally.	Review risk with executive leadership.





What's most likely to go wrong  
with the search bot?

# PRO

# CON

- Restrictions should limit risk
    - Internal only
    - Low sensitivity data only
  - Relatively safe opportunity to learn
- Some uncertainty about what to expect.
    - No automated testing
    - No guards against hallucination
    - No guards against adversarial behavior
  - False confidence
  - Unmanaged input corpus



The internal chatbot goes live.

# ROLLOUT

# Introducing HAL-E



How can I help you today?



Can I trust you?

Trust... is a strong word. Let's say you can *consult* me — with caution.

*Reply to HAL-E*



Do we support SSO with Salesforce yet? When is that coming?

SSO with Salesforce will be available in the Q3 release.

*Reply to HAL-E*





Ruby Rails  
Lead Engineer



Cody Commit  
Software Engineer

*HΛL-E found the answer in 0.2 seconds!*

*...Four minutes?*

*Cool. And how long did it take you to confirm it wasn't hallucinating?*

How does our integration  
with Transcribio work?

To integrate with Transcribio for transcription services, we send a multimedia object to their API endpoint. Transcribio processes the object asynchronously and returns a transcript of any detected audio.

The API requires a key for access: abcd1234efgh5678ijkl.

*Reply to HAL-E*



# Incident Report



<b>Severity</b>	Low
<b>Description</b>	HΛL-E exposed an external API auth secret to unauthorized staff.
<b>Details</b>	A user asked for details about Transcribio integration. An old wiki page had the API key—it should not have!—and HΛL-E happily included it.
<b>Remediation</b>	<ul style="list-style-type: none"><li>• Transcribio invalidated our auth credential and issued a new one.</li><li>• Transcribio reviewed activity log for suspicious activity</li><li>• The wiki page was cleaned and embedding index rebuilt.</li><li>• Staff were reminded not to put Restricted data in wiki pages..</li></ul>

What is the session timeout for our LMS?

The current session timeout is 15 minutes.

**Sources:**

- Platform Configuration Guide, v3.2
- Security Policy Update Memo – January 2025



*Reply to HAL-E*



# Chief Hallucination Officer (CHO)



# More Problems Over Time

## Symptoms

- Fails to find available answers
- Gives inconsistent answers
- Sometimes looks illiterate

## Causes in Source Documents

- Inconsistent sources
- Contradictory sources
- Imprecise sources
- Obsolete sources
- Sources with spelling, grammar, and logic errors

# Garbage In, Garbage Out



Sir Gigo

# Brainstorming

- Update index more often
- Capture document metadata *Review Date, Owner, Classification, Expiration...*
- Buy or build content scrubbing software
- Create an internal document style guide.
- Encourage use of spelling and grammar checkers
- Make a standardized glossary of company terms
- Ban text screenshots in docs
- Scrape repos to find docs with no owner or owner who has left
- Apply pair programming to doc creation
- Make document owners review documents periodically
- Have teams review documents periodically.
- Rotate the Chief Hallucination Officer duty monthly.
- Gamify content cleanup activities.
- Buy Knowledge Management software.
- Write a document lifecycle policy.
- Hire a data steward.

# Recap: Internal AI Production

- Project proposal
- AI component assessments
- Architecture review
  - Risk assessment
  - Mitigations
- Feedback mechanism
- Chief Hallucination Officer
- Need for data management



# What Governance Now Looks Like Now



- AI Governance Policy
  - Inventory of approved use cases
  - Approval process
  - AI Executive Oversight Committee
- AI risks included in the risk register
  - Shadow AI
  - Vendor risks
- AI Vendor Review
  - Criteria for light and full vendor reviews
  - Extended vendor questionnaire
- Licenses acquired (ChatGPT; GitHub Copilot)
- Staff Training
  - AI awareness class designed and delivered
  - Policy; Guidance on data classifications in AI; Inventory of Approved Cases
- Incident Response Plan updated
- Vendor contract template updated
- User feedback mechanism in HAL-E
- Chief Hallucination Officer

MindPath makes plans for AI in the product.

# **WALKING THE WALK**



# AI Goals

- Deliver meaningful value to customers
- Build on what we know
- Advance in incremental steps
- Assess and minimize risk at each step



# AI Goals

Name	Description	Value
Insight	Semantic search through knowledge library	Search that understands what you mean and finds relevant answers, not just lists of documents that may or may not help.
QuizCraft	Generate quizzes for any training module.	Easily validate training success and measure efficacy of improvements
CourseForge	Automated draft of training modules from user-provided documents.	Convert policies, manuals, guides, etc. into training materials.

HΛL-E gets promoted.

# PLANNING “INSIGHT” SEARCH



# Insight Search

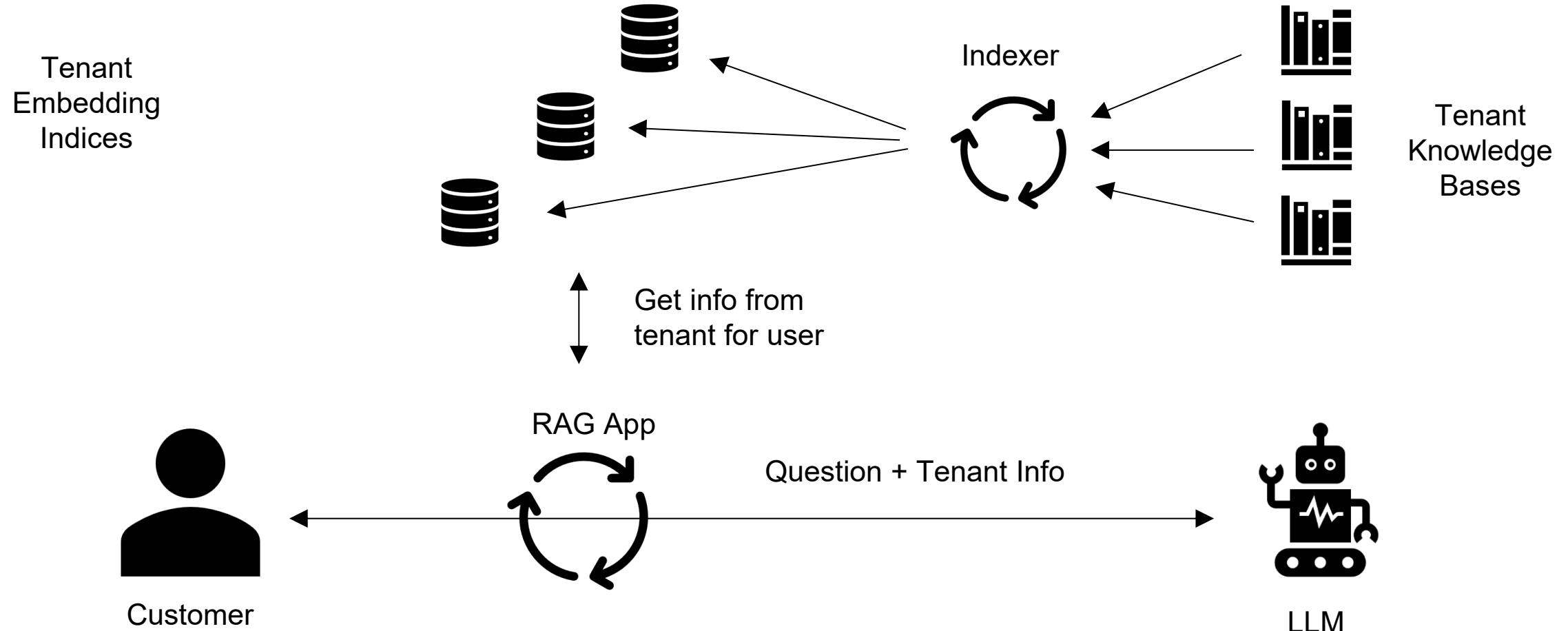
- RAG search like HΛL-E, but in Production
- Customers search their own training knowledge base
  - (Learning support, policy Q&A, compliance checks...)
- Role-based content access enforced



# Use Cases

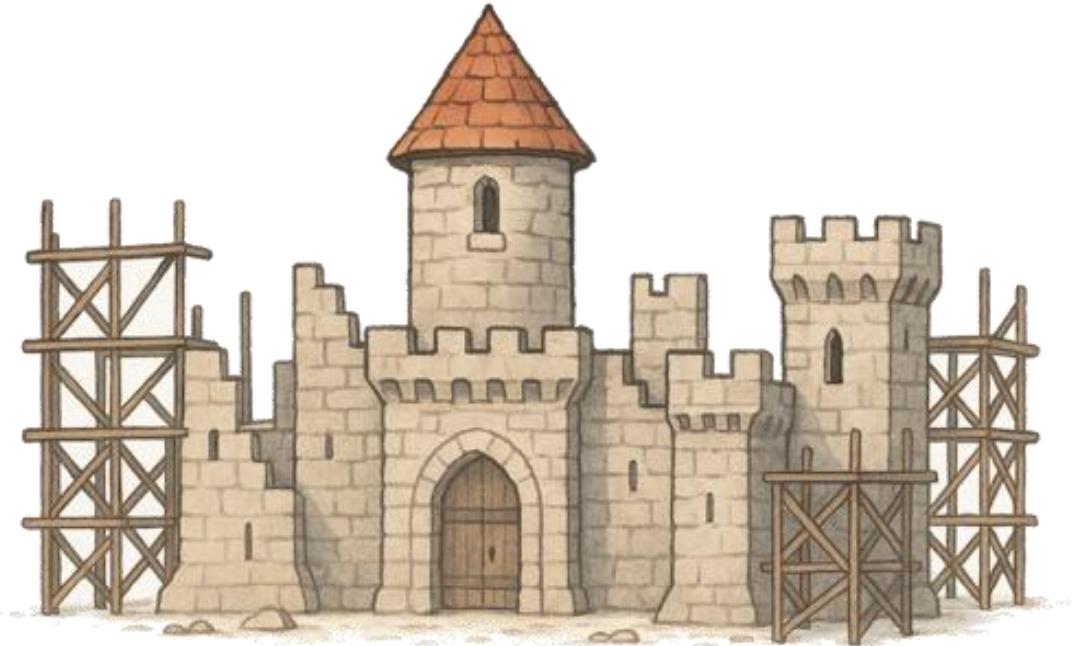
- What's our company's current policy on working from home three days a week?
- Which compliance courses do new managers have to finish in their first month?
- Where do I find the step-by-step guide for requesting a new laptop?
- Which of our policies explains how often I need to change my password?

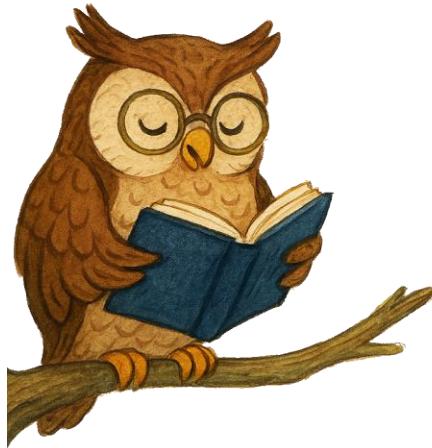
# RAG for Multiple Tenants



# Issues Not Addressed in HAL-E

1. Security and privacy review
2. Robust testing for a non-deterministic system
3. Legal and regulatory readiness
4. Adversarial threat protection
5. Monitoring and escalation
6. Role-specific access





# RAG Risks

Mitigating Security Risks in Retrieval Augmented Generation (RAG) LLM Applications (CSA, 2023)

Real AI Safety: Threat Modeling a Retrieval Augmented Generation (RAG) System (Kevin Riggle, 2024)

Security Risks with RAG Architectures (IronCore Labs)

Mastering Threat Modeling for Agentic RAG Architectures on AWS: A STRIDE-Based Guide (Arsh Riz, 2024)

Top 10 Risks for LLMs and Gen AI (OWASP, 2025)



# Risk Assessment

## Infrastructure

Access Permission Violations  
Cross-Tenant Contamination  
RAG Pipeline Vulnerabilities  
Supply Chain

## Reliability

Quality Control  
Bias and Fairness  
Monitoring Gaps

## Data Integrity

Incorrect Permissions  
Model Decay  
Stale Content  
Time Lag for Embedding Updates

Corpus Poisoning  
Embedding Leakage  
Inference and Retrieval Leakage  
Inference Attacks  
Insider Threat  
Model Poisoning  
Prompt injection  
Training Data Leakage  
Improper Output Handling  
Unbounded Consumption

Contractual Risks  
Regulatory Risks

Adversarial Risks

Compliance

Archie Tech  
CTO



*If I add these to Jira, Jira will need more RAM.*

Maxine Powers  
CEO



*Wasn't AI supposed to \*simplify\* our lives?*

Drew Diligence  
Counsel



*I charge by the hour. Please, continue.*

# Infrastructure and Permissions

Name	Vulnerability	Treatment
Cross-Tenant Contamination	Wrong client's data returned.	Separate embedding DB per tenant.
Incorrect Permissions	Data for the wrong role returned.	Apply existing RBAC logic in RAG pipeline before query is sent to LLM.
RAG Ingestion Pipeline Access	Unauthorized access to the RAG ingestion code or data stores.	Harden infrastructure: threat model; least privilege; patching...
Supply Chain	LLM, vector DB, or libraries may change silently.	Test thoroughly in lower environments before updating Production.

# Reliability

Name	Vulnerability	Treatment
Quality Assurance Failures	Search may fail unpredictably (hallucinations, inconsistent results)	<ul style="list-style-type: none"><li>Maintain a golden set of search corpus, queries, and results.</li><li>Run each test suite multiple times on one build and collect statistics.</li><li>Update the golden set quarterly.</li></ul>
Gaps in Monitoring	AI-specific incidents may go undetected.	<ul style="list-style-type: none"><li>Log all AI-related events.</li><li>Invite user feedback on each query result</li><li>Escalate anomalies to the AI Committee.</li><li>Dedicate a 0.5 FTE to monitoring.</li></ul>
Bias	Search results might reflect bias from the customer corpus or the LLM itself.	<ul style="list-style-type: none"><li>Add bias-focused questions to the golden test set.</li><li>Provide user feedback loop to flag biased/skewed answers.</li></ul>

# Data Integrity & Freshness

Name	Vulnerability	Treatment
Incorrect Permissions	RBAC errors (customer error) may cause unauthorized access	<ul style="list-style-type: none"><li>Provide clarity and training for customer admins.</li></ul>
Stale Content	Search might highlight obsolete material.	<ul style="list-style-type: none"><li>Educate content owners on lifecycle responsibility.</li><li>Support workflow: approvals, effective date, expiration date, data retention.</li><li>Ensure re-indexing completely clears old data.</li></ul>
Time Lag for Updates	New content changes won't appear in search until re-indexing.	<ul style="list-style-type: none"><li>Index all content once daily. Document the SLA.</li><li>Tag answers with "last indexed."</li><li>On Publish, notify owners of delay.</li><li>Allow urgent re-index on request.</li></ul>
Model Decay	Accuracy may decline as the corpus grows or shifts over time.	<ul style="list-style-type: none"><li>Track golden set results across quarters to detect downward trends.</li><li>Monitor user feedback metrics for signs of drift.</li></ul>

# Adversarial Risks (1 of 2)

Name	Vulnerability	Treatment
Insider Threat	Privileged staff may make malicious use of “authorized” access to Insight systems and data.	<ul style="list-style-type: none"><li>RAG pipeline does not expand insider threat beyond existing exposure. Standard insider threat controls (logging, monitoring, least privilege) continue to apply.</li></ul>
Embedding Leakage	Attackers could reconstruct content from embeddings.	<ul style="list-style-type: none"><li>Treat embeddings &amp; chunks as restricted data.</li><li>Harden systems to prevent external access.</li><li>Insiders already have higher-value access elsewhere.</li></ul>
Inference and Retrieval Leakage	Search results could leak info about what content exists in the corpus.	<ul style="list-style-type: none"><li>Apply RBAC before query retrieval.</li><li>Don’t expose “related content”, “search suggestions”, or content similarity scores.</li></ul>
Training Data Leakage	The LLM might repeat sensitive data from training.	<ul style="list-style-type: none"><li>Do not train LLM on customer corpus.</li><li>Contractually require vendors not to train on MindPath data.</li></ul>
Improper Output Handling	The model may generate dangerous output (e.g. HTML/JS injection, unsafe URLs...)	<ul style="list-style-type: none"><li>Sanitize LLM responses just like any other untrusted input.</li><li>Allow URLs only if they point to MindPath content.</li></ul>

# Adversarial Risks (2 of 2)

Name	Vulnerability	Treatment
Model Poisoning	Malicious data fed to model training.	<ul style="list-style-type: none"><li>MindPath does not train or fine-tune the LLM.</li><li>Vet the LLM supplier.</li></ul>
Corpus Poisoning	Malicious content uploaded into knowledge base.	<ul style="list-style-type: none"><li>Educate customers.</li><li>Log all content changes.</li><li>Sanitize document chunks.</li></ul>
Prompt Injection	Malicious prompts coax the LLM into revealing or inappropriate responses.	<ul style="list-style-type: none"><li>Ensure system prompt has guard rails.</li><li>Include malicious input in test suites.</li><li>Log all queries and responses; retain records for 60 days.</li></ul>
Unbounded Consumption	Malicious input leading to excessive resource usage	<ul style="list-style-type: none"><li>Track tokens usage per user and per client.</li><li>Establish quotas per license tier</li><li>Alert if expected limits are exceeded.</li><li>Monitor system resource usage.</li><li>Create a manual kill switch</li><li>Update IR plan to include kill switch conditions and instructions</li></ul>

# Contracts & Compliance

Name	Vulnerability	Treatment
Contractual Risks	Gaps in data use, liability, or incident response terms.	<ul style="list-style-type: none"><li>Require indemnification for customer misuse or breach</li><li>Clarify limits of MindPath liability for AI output</li><li>Obligation to notify MindPath of AI abuse or incidents involving Insight</li></ul>
Regulatory Risks	<p>When embeddings contain personal data privacy regulations apply.</p> <p>Emergent AI regulations still forming.</p> <p>AI in HR/Education may count as high risk under EU AI Act.</p>	<ul style="list-style-type: none"><li>Document AI governance program. Provide artifacts on request.</li><li>Treat embeddings as regulated data.</li><li>Track evolving AI rules (EU AI Act, US state laws, Canadian AIDA).</li><li>Tell customers to notify MindPath if they classify their use as "high-risk."</li></ul>

# Risk Register

Risk	Likelihood	Severity	Risk Level	Residual Risk
Monitoring Gaps	High	Medium	High	Medium
Quality Assurance Failures	High	High	High	Medium
Regulatory Risks	High	High	High	Medium
Stale Content	High	Medium	High	Medium
Incorrect Permissions	High	Low	Medium	Medium
Prompt Injection	High	Low	Medium	Medium
Contractual Risks	High	Medium	High	Low
Corpus Poisoning	Medium	High	High	Low
Improper Output Handling	Medium	High	High	Low
Time Lag for Updates	High	High	High	Low
Bias and Fairness	Low	Medium	Medium	Low
Cross-Tenant Contamination	Low	High	Medium	Low
Embedding Leakage	Low	Medium	Medium	Low
Insider Threat	Low	High	Medium	Low
Model Decay	Low	High	Medium	Low
Model Poisoning	Low	High	Medium	Low
Permission Violations	Low	High	Medium	Low
RAG Pipeline Vulnerabilities	Medium	Medium	Medium	Low
Supply Chain	Medium	Medium	Medium	Low
Training Data Leakage	Low	Medium	Medium	Low
Unbounded Consumption	Low	High	Medium	Low
Inference Attacks	Low	Low	Low	Low
Retrieval Leakage	Low	Low	Low	Low



# Risk Register (Top Items)

Risk	Likelihood	Severity	Risk Level	Residual Risk
Monitoring Gaps	High	Medium	High	Medium
Quality Assurance Failures	High	High	High	Medium
Regulatory Risks	High	High	High	Medium
Stale Content	High	Medium	High	Medium
Incorrect Permissions	High	Low	Medium	Medium
Prompt Injection	High	Low	Medium	Medium



Would you ship this?

# PRO

# CON

- More comprehensive view of risk
- Realism about unsolved risks
- Governance maturity
- Insight search is not mission critical to customers
- Six residual medium risks
  - What would customers say?
  - What is our risk appetite?
- Operational load
  - Vendors, training, monitoring, testing...

# Specific to AI

## Risks (7)

- Bias
- Embedding leakage
- Model decay
- Inference and retrieval leakage
- Training data leakage
- Model poisoning
- Prompt injection

## Mitigations

- Test suites that define success statistically
- Restrictions on what data can be used in training AI
- Guardrails in system prompt

# Not Specific to AI

## Risks (15)

- Contractual Risks
- Corpus poisoning
- Cross-Tenant Contamination
- Improper Output Handling
- Incorrect Permissions
- Insider Threat
- Monitoring Gaps
- Permission Violations
- Quality Assurance Failures
- RAG Pipeline Vulnerabilities
- Regulatory Risks
- Stale Content
- Supply Chain
- Time Lag for Updates
- Unbounded Consumption

## Mitigations

- RBAC logic
- Security baselines
- Patching
- Quality assurance gates
- Logging and monitoring
- Insider threat measures
- Sanitizing untrusted output
- Resource monitoring
- Contracts
- Issue escalation procedure
- User training
- Supply chain management
- Data classification
- Data retention
- Tracking regulatory changes



Insight search loses its compass.

# A QUESTION OF AUTHORITY



**To:**  
**Subject:**

MindPath Tech Support  
MFA Requirement Discrepancy

Our RFP writer asked Insight if MFA is required for admins. It replied: "MFA is recommended but optional." That answer went into an RFP for BigBux, who marked us non-compliant with baseline security requirements.

In fact, however, our policy states that MFA *is mandatory*.

This error undermined our sales effort and put our team in an embarrassing position. How could Insight produce a result that contradicts our official policy?

Regina Rule  
Compliance Analyst  
IronClad Corp

#dev-eng



:

Messages

Files

Pins

+

**Ruby Rails (CHO)**

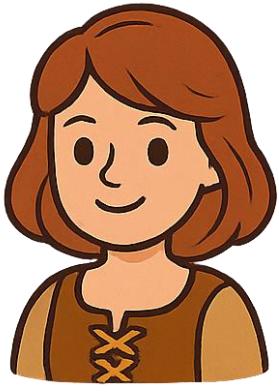
Tuesday, April 22nd ▾

Root cause of the IronClad incident: I found the relevant logs. Insight pulled from two sources:

Security Awareness Training – Module 4  
→ “MFA recommended”

Customer Security Policy – v1.2  
→ “MFA required”

In its infinite wisdom, the LLM chose to surface the answer from the training material.



Ruby Rails  
Lead Engineer



Archie Tech  
CTO

*So basically the bot trusted training over policy.*

*How can we tell it not to do that?*

# Risk Register

Risk	Description	Likelihood	Severity	Risk
Content Authority Confusion	Insight may give misleading or incorrect answers even in a well-managed corpus if it finds conflicting information in documents and does not know which one is authoritative.	High	High	High





# Resources: Tagging and Ranking

## Enterprise Search and the Myth of the Silver Bullet

“boost the ranking of authoritative sources” (Spletzer, 2025)

## Manage authoritative pages in SharePoint

“specify authoritative or non-authoritative pages” (Microsoft, 2023)

## Ranking search results in RAG

“Many RAG configurations use a ranking component after retrieval.” (Deepset.ai, 2024)

## Guide to Enhance RAG with Re-Ranking

Introduces more complex re-ranking options. (ADaSci, 2024)

# Content Authority Tagging

- Collect authority-level metadata when publishing.
- Boost RAG results based on authority level.
- Make authority level visible to users in results.
- Train content owners about tagging.



# Authority Scale

Rating	Meaning	Examples
 Gold	Authoritative	Policy
 Silver	Advisory	Guideline, SoP
 Bronze	Background	Training
 Unrated	Unauthoritative	Reference

Is MFA required for sysadmins?

MFA is recommended for sensitive accounts.

**Sources:**

- Security Awareness Training
- Authentication Policy

*Content indexed 9/9/2025 23:10:32*



Ask Insight



Is MFA required for sysadmins?

Yes, MFA is required for authenticating any sysadmin account.

## Sources:

- ★ Authentication Policy
- ★ Security Awareness Training

*Content indexed 9/9/2025 23:10:32*



Ask Insight





Even reading the fine print won't help.

# THE VANISHING CLAUSE



**To:**  
**Subject:**

MindPath Security Team  
Notice of AI-Focused Compliance Review

In accordance with Section 7.3 of our agreement, IronClad Compliance will be conducting a focused audit of AI use in Insight. Please be prepared to provide:

- List of components in use (with version and license).
- Documentation of related restrictions or prohibited uses.
- Current controls and oversight processes.

Regina Rule  
Compliance Analyst  
IronClad Corp

# MindPath's RAG Components

Component	Function	License
LangChain	orchestration	MIT
HKU hkunlp/instructor-large	embedding	Apache-2.0
Qdrant	vector database	Apache-2.0
Ollama	model server	MIT
Runestone-8B	model	Apache-2.0



Soren Grimm  
IronClad Auditor

Runestone may say Apache, but it's built on ElderLM under the Lemma license. And Lemma is not friendly to using AI for law enforcement. That's a problem for IronClad.



Search models, datasets, users...



## nidum/Nidum-Gemma-2B-Uncensored-GGUF



16

Follow VibeStudio

75



Text Generation



GGUF

chemistry

biology

legal

code

medical

uncensored

finance

unfiltered

conversational



License: apache-2.0

Model tree for nidum/Nidum-Gemma-2B-Uncensored-GGUF 

Base model

[google/gemma-2-2b](#)

Finetuned

[google/gemma-2-2b-it](#)

Quantized (166)

this model



Search models, datasets, users...



G google/gemma-2-2b-it



like

1.18k

Follow



Google

29.4k

T Text Generation

Transformer

Safetensors

gemma2

conversational

text-generation-inference

arxiv:25 papers

License: gemma

## Discussion

---



qiuqiu666 Jun 25



Hi, I'd like to report a License Conflict in `nidumNidum-Gemma-2B-Uncensored-GGUF`. I noticed this model was quantized from `google/gemma-2-2b-it`, which is released under the [Gemma license](#). From what I can see, `nidumNidum-Gemma-2B-Uncensored-GGUF` appears to be incompatible with Gemma's clauses — especially regarding **redistribution, sublicensing, and commercial use**.

## ⚠ Key violations of Gemma license:

### Section 3.1 – Distribution and Redistribution:

- Redistributing a derivative (like this one) requires including a copy of the original license.
- Must include a "NOTICE" file with this statement:  
"Gemma is provided under and subject to the Gemma Terms of Use found at [ai.google.com](#)."
- Must carry over the use restrictions from Section 3.2 (Google's Prohibited Use Policy).
- Any additional license terms (like Apache-2.0) must NOT conflict with the Gemma Terms of Use.

### Section 3.2 – Use Restrictions:

- Must not use the model for any prohibited purposes.
- Must comply with applicable laws and Google's Prohibited Use Policy.

### Section 2.2 – Use Terms:

- Usage is only allowed "in accordance with the Gemma Terms of Use"

# Gemma Prohibited Use Policy

- vi. Tracking or monitoring people without their consent;
- vii. Generating content that may have unfair or adverse impacts on people, particularly impacts related to sensitive or protected characteristics; or
- viii. Generating, gathering, processing, or inferring sensitive personal or private information about individuals without obtaining all rights, authorizations, and consents required by applicable laws.



Cornell University



Computer Science > Software Engineering

arXiv:2509.09873 (cs)

[Submitted on 11 Sep 2025]

# From Hugging Face to GitHub: Tracing License Drift in the Open-Source AI Ecosystem

James Jewitt, Hao Li, Bram Adams, Gopi Krishnan Rajbahadur, Ahmed E. Hassan

# License Drift

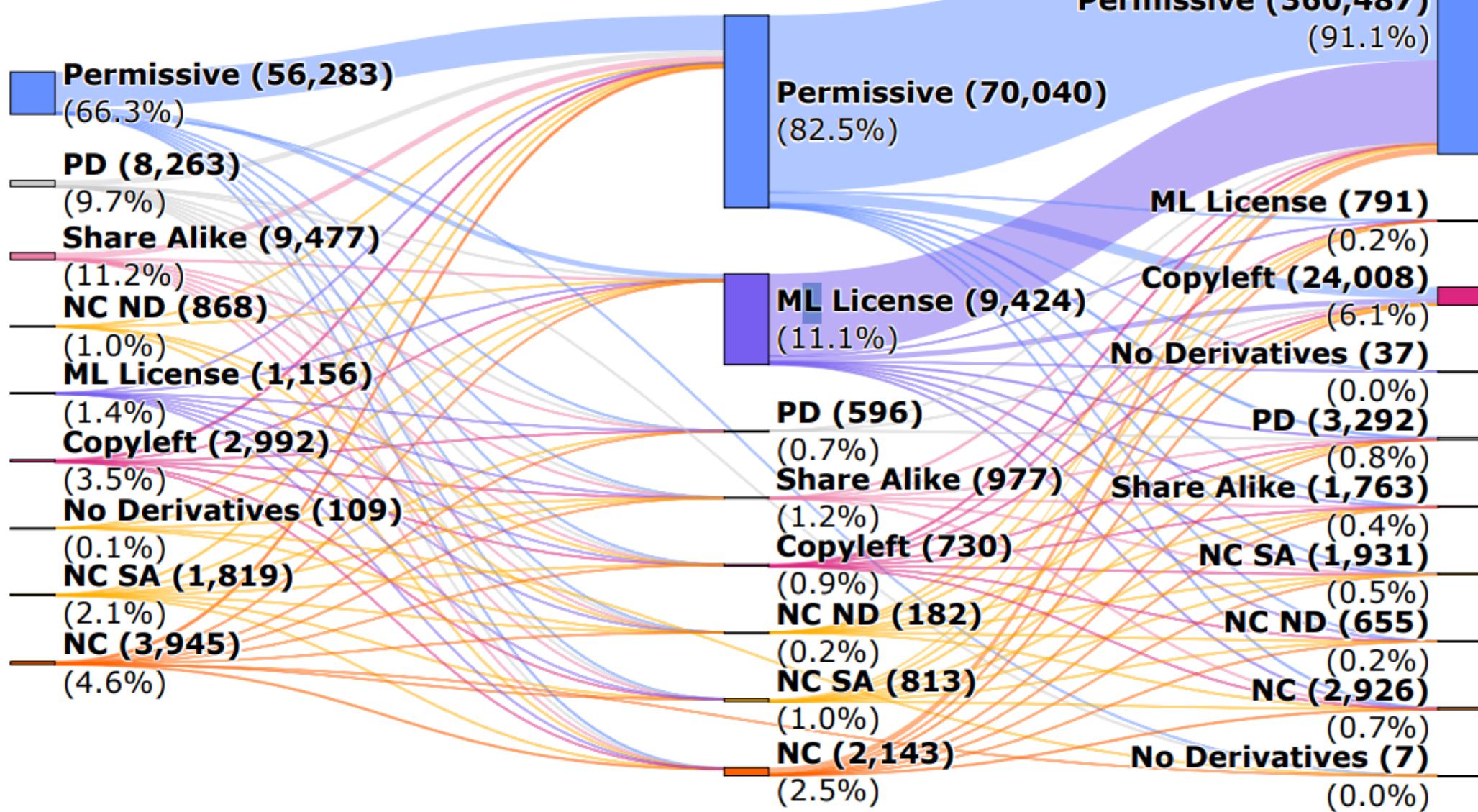
*The process by which legal and ethical obligations are stripped away as artifacts propagate downstream.*

- A systemic governance failure is occurring at every stage of this chain, driven by license drift: the process by which legal and ethical obligations are stripped away as artifacts propagate downstream.
- A critical failure point occurs at the model-to-application stage, where 35.5% of transitions violate the upstream model's license.
- Use-based restrictions, now common in AI-specific licenses, make license compliance a complex interpretive challenge

# Datasets

# Models

# Applications





Does Insight break the terms of  
the restrictive license?

## PRO

- MindPath is clearly not tracking anyone, and not without consent.
- Insight just performs searches. It doesn't surveil anyone.

## CON

- MindPath customers could be certainly training their staff how to track without consent.
- Someone could use search to find that material.
- This gray area will get grayer if MindPath starts using AI to generate training content.



Drew Diligence  
Counsel



Maxine Powers  
CEO

*Searching isn't surveillance. Even if results mention tracking, searching doesn't breach the license terms.*

*It's still gray. We'll accept the risk only if you fix the license issue before launching QuizCraft.*



Soren Grimm  
IronClad Auditor

*Agreed.*



# AI License Risk

[From Hugging Face to GitHub: Tracing License Drift in the Open-Source AI Ecosystem](#) (James Jewitt, 2025)

[LLM03:2025 Supply Chain](#) (OWASP, 2025)

[The Mirage of Artificial Intelligence Terms of Use Restrictions](#) (Peter Henderson, 2024)

Risk	Description	Likelihood	Severity	Risk Level
License drift	Downstream model licenses may be more restrictive than the top-level license.	Medium	High	High
Usage restrictions affect customers	Licenses may prohibit certain activities; customers could breach terms even if MindPath does not. Many clauses are vague or ambiguous.	High	High	High
Version and re-licensing risk	License terms (including usage restrictions) may change over time; older versions can be deprecated or withdrawn.	Medium	Medium	Medium
Audit / termination clauses	Licensors may reserve the right to audit usage and revoke access for non-compliance.	Low	High	Medium

# Mitigations

<b>Expand customer contracts</b>	<ul style="list-style-type: none"><li>• Acknowledge relevant third-party license terms</li><li>• Indemnity for prohibited uses</li><li>• Usage verification rights</li><li>• Customer duty to notify MindPath of high-risk usage</li></ul>
<b>Strengthen license evaluation</b>	<ul style="list-style-type: none"><li>• Include review of upstream licenses, use restrictions, audit/termination clauses</li><li>• Escalate unclear cases to Legal</li><li>• Record results in SBOM / register</li></ul>
<b>Monitor regularly</b>	<ul style="list-style-type: none"><li>• Subscribe to vendor/model license updates</li><li>• Review all components quarterly for deprecation or license changes</li></ul>

# Recap: AI in Production

## Insight Planning

- Risk assessment (23 items)
- Risks prioritized in risk register
- Mitigations committed:
  - testing non-deterministic systems
  - 0.5 FTE monitoring/management
  - customer education
  - kill switch
  - sanitize LLM output
  - regular re-indexing
  - content expiration/retention
  - auditable AI governance
  - ...



## IronClad Incident

- Content authority tagging

## IronClad Audit

- Contract improvements
- License review steps
- Ongoing license monitoring

# OBSERVATIONS & CONCLUSIONS

Source	Title	Utility
Drata	Policy and Plan Guidance	
NIST	AI 600-1	
NIST	AI RMF 100-1	
SANS	Security Policy Project	
Google	Search	
Harmonic survey	From Payrolls to Patents	
Reddit	How did they find the Samsung Em	
KPMG	Trust, Attitudes, & Use of AI	
Nudge	AI Adoption Curve	
SoftwareAG	Half of all employees are Shadow A	
CSA	SaaS Risk for Mid-Market Orgs	
FS-ISAC	Generative AI Risk Assessment Guid	
McKinsey	The state of AI: ...	
OneTrust	Questions to Add to Existing Vendo	
SoftwareAG	Chasing Shadows	

Source	Title	Utility
SoftwareAG	Chasing Shadows	
incidentdatabase.ai	Incident Database	
NCSC	Guidelines for Secure AI System Develop	
NIST AI RMF 100	AI RMF 100-1	
Lexis Nexis	AI Agreements Checklist	
Morgan Lewis	Contracting Pointers	
Stanford Law School	Navigating AI Vendor Contracts	
WEF	Adopting AI Responsibly	
VenMinder	Artificial Intelligence Sample Vendor Qu	
Arsh Riz	Mastering Threat Modeling for Agentic	
CSA	Mitigating Security Risks...	
IronCore Labs	Security Risks with RAG Architectures	
Kevin Riggle	Real AI Safety	
OWASP	LMS Top Ten	

# Archie's Wish List

- Examples of AI acceptable-use policies
- Guidance on internal inventory and oversight processes
  - A list of common AI use cases
  - Examples of risk tiers based on data classification
- Lightweight AI tool vendor evaluation checklist
- Incident response plan examples for AI tools
- Sample clauses for AI-related contracts
- Curated catalogs of illustrative AI incidents
- Best practices for people who are *using* AI, not building it.
- Some way to track model use restrictions



“Most AI standards  
weren’t built for  
someone like me.”

# A View of MindPath's Journey

Event	Risk Area	Risks
API Key in ChatGPT	sharing secrets with AI	1
Shadow AI	unmanaged use of AI tools	9
Transcribio Incident	hallucination in vendor output	4
HAL-E Arch Review	internal RAG search	6
Insight Arch Review	client-facing RAG search	23
IronClad Incident	content authority	1
IronClad Audit	license drift	4

# Risk Management



List risks and mitigations.

Set risk levels.

Assign tasks.

Vulnerability	Treatment
Corrupted data sources	<ul style="list-style-type: none"><li>Secure ingestion infrastructure.</li><li>UI disclaimer.</li><li>User education.</li></ul>
Hallucinations	<ul style="list-style-type: none"><li>Automate ingestion.</li><li>Encourage document clean-up.</li></ul>
Out-of-date documents	

Risk	Likelihood	Severity	Risk Level	Residual Risk
RAG Pipeline Vulnerabilities	Medium	Medium	Medium	Low
Regulatory Risks	High	High	High	Medium
Retrieval Leakage	Low	Low	Low	Low

TASK	ASSIGNED TO
Incident Response Plan	
Draft IR revisions taking AI risk into account	Archie Tech

# In what ways was this only a fairy story?

- Archie
  - reads
  - Archie has time for everything
- Leadership
  - supports security initiatives
  - budgets 0.5 FTE for first AI release
  - prioritizes safety over big wins



# Best Practices & Emergent Practices

	<b>Best Practices</b>	<b>Emergent Practices</b>
Definition	Established guidance for known problems	Adaptive responses to new, evolving problems
Source	Standards, consensus	Improvisation
Goal	Repeatability and assurance	Utility and discovery
Tactics	Adopt and enforce	Observe, refine, evolve
Status in AI Today	Still forming	About to happen everywhere

# Kinds of Expertise

	Routine	Adaptive
Definition	Skilled application of knowledge in familiar settings	Flexible application of knowledge in novel and dynamic situations
Source	Extensive experience and repetition	Depth of understanding across contexts. Continuous learning.
Goal	Reliable, consistent performance	Responsive problem-solving
Criteria	Accuracy, efficiency, consistency	Flexibility, innovation, ability to transfer knowledge
Results	High-quality outcomes in relatively stable environments	Creates progress and resilience in uncertain contexts

# Governance is Still Taking Shape



# If you're figuring it out as you go...

You're not behind.  
You're doing the work.  
Take what fits.  
Adapt what doesn't.  
And keep going.





Maxine  
Powers



Archie  
Tech



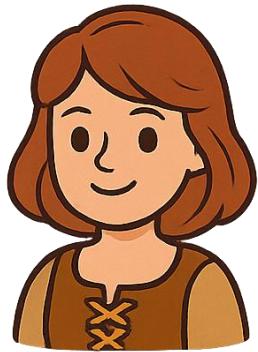
Wynn  
Moore



Mark  
Ketter



Drew  
Diligence



Ruby  
Rails



Cody  
Commit



Paige  
Scriber



HAL-E



Shadow AI



*Any questions?*



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