

INDEPENDENT  
HIGH-LEVEL EXPERT GROUP ON  
ARTIFICIAL INTELLIGENCE  
SET UP BY THE EUROPEAN COMMISSION



THE ASSESSMENT LIST FOR  
TRUSTWORTHY ARTIFICIAL  
INTELLIGENCE (ALTAI)  
*for self assessment*

## Table of Contents

<b>Introduction</b>	<b>3</b>
How to use this Assessment List for Trustworthy AI (ALTAI)	4
<b>REQUIREMENT #1 Human Agency and Oversight</b>	<b>7</b>
Human Agency and Autonomy	7
Human Oversight	8
<b>REQUIREMENT #2 Technical Robustness and Safety</b>	<b>9</b>
Resilience to Attack and Security	9
General Safety	9
Accuracy	10
Reliability, Fall-back plans and Reproducibility	10
<b>REQUIREMENT #3 Privacy and Data Governance</b>	<b>12</b>
Privacy	12
Data Governance	12
<b>REQUIREMENT #4 Transparency</b>	<b>14</b>
Traceability	14
Explainability	14
Communication	15
<b>REQUIREMENT #5 Diversity, Non-discrimination and Fairness</b>	<b>15</b>
Avoidance of Unfair Bias	16
Accessibility and Universal Design	17
Stakeholder Participation	18
<b>REQUIREMENT #6 Societal and Environmental Well-being</b>	<b>18</b>
Environmental Well-being	19
Impact on Work and Skills	19
Impact on Society at large or Democracy	20
<b>REQUIREMENT #7 Accountability</b>	<b>21</b>
Auditability	21
Risk Management	21
<b>Glossary</b>	<b>23</b>

## REQUIREMENT #3 Privacy and Data Governance

Closely linked to the principle of prevention of harm is privacy, a fundamental right particularly affected by AI systems. Prevention of harm to privacy also necessitates adequate data governance that covers the quality and integrity of the data used, its relevance in light of the domain in which the AI systems will be deployed, its access protocols and the capability to process data in a manner that protects privacy.

**Glossary:** Aggregation and Anonymisation; AI System; Data Governance; Data Protection Impact Assessment (DPIA); Data Protection Officer (DPO); Encryption; Lifecycle; Pseudonymisation; Standards; Use Case.

### Privacy

This subsection helps to self-assess the impact of the AI system's impact on privacy and data protection, which are fundamental rights that are closely related to each other and to the fundamental right to the integrity of the person, which covers the respect for a person's mental and physical integrity.

- Did you consider the impact of the AI system on the right to privacy, the right to physical, mental and/or moral integrity and the right to data protection?
- Depending on the use case, did you establish mechanisms that allow flagging issues related to privacy concerning the AI system?

### Data Governance

This subsection helps to self-assess the adherence of the AI system('s use) to various elements concerning data protection.

- Is your AI system being trained, or was it developed, by using or processing personal data (including special categories of personal data)?
- Did you put in place any of the following measures some of which are mandatory under the General Data Protection Regulation (GDPR), or a non-European equivalent?
  - Data Protection Impact Assessment (DPIA)<sup>23</sup>;
  - Designate a Data Protection Officer (DPO)<sup>24</sup> and include them at an early state in the development, procurement or use phase of the AI system;
  - Oversight mechanisms for data processing (including limiting access to qualified personnel, mechanisms for logging data access and making modifications);
  - Measures to achieve privacy-by-design and default (e.g. encryption, pseudonymisation, aggregation, anonymisation);

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<sup>23</sup> <https://gdpr.eu/data-protection-impact-assessment-template/>.

<sup>24</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/>.

## Assessment List for Trustworthy AI (ALTAI)

- Data minimisation, in particular personal data (including special categories of data);
  - Did you implement the right to withdraw consent, the right to object and the right to be forgotten into the development of the AI system?
  - Did you consider the privacy and data protection implications of data collected, generated or processed over the course of the AI system's life cycle?
- Did you consider the privacy and data protection implications of the AI system's non-personal training-data or other processed non-personal data?
- Did you align the AI system with relevant standards (e.g. ISO<sup>25</sup>, IEEE<sup>26</sup>) or widely adopted protocols for (daily) data management and governance?

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<sup>25</sup> <https://www.iso.org/committee/6794475.html>.

<sup>26</sup> <https://standards.ieee.org/industry-connections/ec/autonomous-systems.html>.

