Introduction

Aviva welcomes the chance to respond to the EU's consultation on the AI White Paper. We support the EU's objectives to promote the uptake of AI and to address the potential risks. AI brings a range of benefits to individuals, businesses and wider society and by using a range of AI technologies we are improving the products and services we give to our customers. We welcome the focus on building on work to date to promote ethical and trustworthy AI.

We have provided below additional comments on building an ecosystem of trust and we look forward to continuing to engage in proposals as they develop.

An Ecosystem of Trust

Emerging risks

As set out in our response, concerns about AI technologies are legitimate and extremely important and should be carefully considered.

As AI technologies continue to evolve, we encourage continuously reviewing the impact and the potential for new risks to emerge. We would specifically highlight looking at any potential impacts of the interpretability of models as they become increasingly complex, the speed and scale of machine learning and the impact of combining data sets.

Possible adjustments to existing EU legislative frameworks relating to AI (Section B)

What is referred to as "AI" is in fact a collection of different technologies and techniques. Each type of technology or technique is part of a process that leads to an outcome whether that be a product recommendation, a price or a decision on whether to accept a claim. We have different legislative frameworks to respond to these different outcomes in different contexts and believe frameworks should continue to be bespoke to the outcome that those techniques and technologies are trying to lead to regardless of the type of technology or technique used in the process.

As such, we welcome the approach set out in the White Paper to look at whether existing legislation adequately addresses the risks created by AI. A focus on sector and application of AI technologies which ensures a coordinated and consistent approach with existing requirements will be key to ensuring effective review. If any gaps are identified, making adjustments and updating existing legislation is a sensible approach.

We would reiterate the point made in the previous section that as AI continues to evolve, we need to be continuously reviewing the impact of new technologies and ensure existing frameworks are fit for purpose.

Voluntary labelling for non-high risk AI applications

We fully support the EU's objective to build and promote trust in AI technologies and believe a combination of increased public education, transparency and understanding of AI will help do so. In our view it is crucial to understand consumers' concerns and work to address those. In 2018 we developed a customer data charter and conducted extensive consumer research to get to the heart of customers' concerns. The main concern was to keep data secure and it was interesting to us that a significant proportion of customers had little understanding of the protections and requirements in

place to protect their data so we worked to clearly communicate with our customers as to how we do so.

The proposal for a voluntary labelling system for non-high risk AI applications could play a useful role in building understanding and trust. We welcome an approach that is focused on addressing consumers' concerns and does not place the expectation to understand a system on individuals. As such, any voluntary labelling system should be simple and clear to implement for both users and those implementing the system. Something akin to the Fairtrade mark which helps take away complexity from a complicated process but helps give people a high level of understanding and assurance could be an interesting model to look to.

To drive trust in the system, any accreditation would need to ensure it is meaningful and transparent to avoid a tick box exercise or accusations of "ethics washing" which would have the opposite effect. A principles based approach would be helpful in doing this and we would recommend working closely with a range of stakeholders across sectors to explore the approach.