Data Protection Impact Assessment (DPIA)

KITT AI Agent

Executive Summary

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As part of THN's ongoing commitment to data protection compliance in accordance with the UK GDPR, the EU General Data Protection Regulation (GDPR), and the UK Data Protection Act 2018, a Data Protection Impact Assessment (DPIA) has been conducted on the KITT AI system, which incorporates artificial intelligence (AI) functionalities. This system processes user communications via text and voice to support service interactions and enhance operational efficiency.

Purpose of the DPIA

The DPIA was carried out to assess potential privacy risks associated with the use of the KITT AI system, which involves automated processing, the use of AI, and the potential recording and storage of communications. The objective was to determine whether such processing could pose high risks to individuals' rights and freedoms and to ensure appropriate safeguards are in place.

Scope of Processing

- **Processing Activity**: Recording, storage, and analysis of user interactions via chat and voice, including AI-generated responses.

- **Purpose**: To improve customer service experience, monitor service quality, and analyse operational metrics.

- **Categories of Data**: Voice recordings, chat transcripts, potentially identifying information (name, contact details), and any other data voluntarily provided by the user.

- **Data Subjects**: External users (customers, potential customers).

- **Legal Basis**: Explicit consent for the recording and processing of communications.

Stakeholder Involvement

While the DPIA was led by THN's Data Governance team, it included consultation with:

- Internal ESG and Compliance units.

- The Data Protection Officer (DPO) or equivalent responsible person.

- Technical teams responsible for the deployment of KITT AI.

- External vendors were involved in the technology or processing activities.

Key Findings

Risks were identified in four key areas:

1. Transparency – Ensuring users are aware that they are interacting with an AI system and that their communications may be recorded.

2. Human Oversight – Avoiding fully automated decision-making without human review.

3. Data Retention – Establishing clear timelines for data storage and deletion.

4. Consent – Ensuring explicit and informed consent is obtained before any data processing occurs.

These risks were assessed based on likelihood and severity. The residual risk level was deemed acceptable due to the controls already in place.

Risk Mitigation Measures

THN has implemented and is committed to maintaining the following safeguards:

- Clear User Information: Individuals are informed that they are interacting with an AI system and that communications may be recorded.

- Human Oversight: All AI-generated responses are subject to human review.

- Retention Control: Internal policies define the maximum retention period for chat and call data.

- Explicit Consent: Processing only takes place once the user has provided clear, express consent.

- Periodic Review: All measures will be reviewed regularly to ensure ongoing compliance.

Final Conclusion

No high residual risks have been identified following the implementation of the proposed safeguards. Therefore, it is determined that the KITT AI system may be lawfully deployed and operated, provided that:

- The implemented control measures are maintained and regularly monitored.

- No substantial changes are introduced without a new impact assessment.

- This DPIA is reviewed periodically, especially if there are changes to the technology, purpose, or scope of processing.