

# **Artificial Intelligence (AI) Usage Policy**

## **Introduction**

Sikorska Notary Limited is committed to maintaining the highest standards of professional integrity, confidentiality, data protection and client care.

Artificial Intelligence ("AI") technologies may provide useful tools to assist with administrative, compliance and operational activities. However, the use of AI does not diminish our professional responsibilities as a Notary Public regulated through the Faculty Office of the Archbishop of Canterbury.

This policy explains how we approach the use of AI within our practice and the safeguards we apply to protect our clients, their information and the integrity of our services.

## **Our Principles**

Our use of AI is guided by the following principles:

### **1. Act with Integrity**

We use AI in a manner consistent with our professional obligations, legal duties and regulatory requirements.

We remain responsible and accountable for all work undertaken on behalf of clients, regardless of whether AI-assisted tools have been used during the process.

We exercise professional judgement at all times and do not rely upon AI-generated content without appropriate review and verification.

No notarial act, certification, identity verification decision, risk assessment, legal judgement or professional opinion is made solely by an AI system.

### **2. Design for Confidentiality and Privacy**

Protection of client confidentiality is fundamental to notarial practice.

When using AI-assisted tools we take reasonable steps to ensure that:

- confidential information is protected;
- personal data is processed lawfully, fairly and transparently;
- appropriate technical and organisational safeguards are in place;
- access to information is restricted to authorised persons;
- data is handled in accordance with the UK GDPR, Data Protection Act 2018 and our Privacy Notice.

We will not knowingly enter confidential client information, identity documents, special category personal data or other sensitive information into public AI systems unless appropriate safeguards have been implemented and such use is lawful, necessary and proportionate.

### **3. Use AI Responsibly**

We use AI only where it is appropriate to support the delivery of professional services.

Potential uses may include:

- administrative support;
- document management;
- transcription;
- translation assistance;
- legal and regulatory research support;
- drafting assistance;
- compliance support;
- practice management functions.

AI is used as an aid to human decision-making and not as a substitute for professional expertise.

We recognise that AI systems may produce inaccurate, incomplete or misleading information. Any output generated by AI is therefore reviewed critically before being relied upon.

#### **4. Build and Use AI Securely**

Before adopting new AI tools, we consider:

- confidentiality risks;
- data protection implications;
- cybersecurity risks;
- reliability and accuracy;
- supplier security standards;
- regulatory and professional obligations.

We seek to use reputable providers with appropriate contractual, technical and organisational safeguards.

Where appropriate, risk assessments are carried out before introducing new AI systems or significantly changing the way existing systems are used.

#### **5. Engage Openly**

We are committed to transparency regarding our use of AI.

Information about our use of AI is provided through our Terms of Business, Privacy Notice and this Policy.

Clients may ask questions about our use of AI and how their information is protected.

We will continue to monitor developments in technology, law, regulation and professional guidance to ensure that our approach remains responsible and proportionate.

#### **Human Oversight**

AI systems do not replace professional judgement.

All notarial decisions remain under the control and responsibility of the Notary.

Human review is applied to any AI-generated output before it is relied upon in connection with:

- identity verification;

- anti-money laundering compliance;
- sanctions screening;
- proliferation financing assessments;
- Companies House identity verification;
- notarial certificates;
- legal analysis;
- client advice;
- regulatory reporting.

### **Automated Decision-Making**

The practice does not use AI or other automated systems to make decisions that have legal or similarly significant effects on clients without meaningful human involvement.

### **Data Protection**

Where AI tools process personal data, such processing will be undertaken in accordance with:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Privacy and Electronic Communications Regulations (where applicable);
- Faculty Office guidance;
- applicable professional obligations.

Further information is available in our Privacy Notice.

### **Training and Review**

We keep our approach to AI under review and seek to remain informed about developments in technology, regulation and professional guidance.

This policy will be reviewed periodically and updated where necessary to reflect changes in law, regulatory requirements, professional guidance or operational practices.

### **Contact**

Questions regarding this Policy or our use of AI may be directed to:

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