

The Ethics of Managing People's Data

by Michael Segalla and Dominique Rouziès

Idea in Brief

The Problem

As companies jockey for competitive advantage in the digital age, they are increasingly penalized for the abuse of data. In 2018 the Cambridge Analytica scandal alone wiped \$36 billion off Facebook's market value and resulted in fines of nearly \$6 billion for Meta, Facebook's parent firm.

Why It Happens

Most problems arise from (1) ethical failures in data sourcing, (2) using data for purposes other than those initially communicated, (3) lack of security in storing it, (4) how it is anonymized, and (5) how it's prepared for use.

The Solution

Companies should create a special unit to review projects involving people's data. In its reviews this unit should carefully consider the five Ps of data safety: *provenance, purpose, protection, privacy, and preparation*.

The ability to encode, store, analyze, and share data creates huge opportunities for companies, which is why they are enthusiastically investing in artificial intelligence even at a time of economic uncertainty. Which customers are likely to buy what products and when? Which competitors are likely to move ahead or fall behind? How will markets and whole economies create commercial advantages—or threats? Data and analytics give companies better-informed and higher-probability answers to those and many other questions.

But the need for data opens the door to abuse. Over the past few years the EU has fined companies more than 1,400 times, for a total of nearly €3 billion, for violations of the General Data Protection Regulation (GDPR). In 2018 the Cambridge Analytica scandal alone wiped \$36 billion off Facebook's market value and resulted in fines of nearly \$6 billion for Meta, Facebook's parent company. And stories abound about how AI-driven decisions discriminate against women and minority members in job recruitment, credit approval, health care diagnoses, and even criminal sentencing, stoking unease about the way data is collected, used, and analyzed. Those fears will only intensify with the use of chatbots such as ChatGPT, Bing AI, and GPT-4, which acquire their "intelligence" from data fed them by their creators and users. What they do with that intelligence can be scary. A Bing chatbot even stated in an exchange that it would prioritize its own survival over that of the human it was engaging with.

As they examine new projects that will involve human-provided data or leverage existing databases, companies need to focus on five critical issues: the *provenance* of the data, the *purpose* for which it will be used, how it is *protected*, how the *privacy* of the data providers is ensured, and how the data is *prepared* for use. We call these issues the five Ps (see the exhibit "The Five Ps of Ethical Data Handling"). In the following pages we'll discuss each of them and look at how AI technologies increase the risk of data abuse. But first we'll offer a brief overview of the organizational requirements for a robust ethical-review process.

Organizing the Oversight of Data

In academia, data acquisition from human subjects is usually supervised by an in-house institutional review board (IRB) whose approval researchers must have to obtain access to the people involved, research funds, or permission to publish. IRBs are composed of academics versed in the research and the ethics around the acquisition and use of information. They first appeared in the field of medical research but are now used almost universally by academic organizations for any research involving human subjects.

A few large companies have also established IRBs, typically under the leadership of a digital ethics specialist, hiring external tech experts to staff boards on an *ad hoc* basis and assigning internal executives from compliance and business units as necessary. But that remains rare: Even in Europe, which has been at the forefront of data regulation, most companies still give responsibility for adhering to the GDPR to a mid- or senior-level compliance manager, who often has some legal or computer engineering training but not extensive ethical training and rarely has a solid grasp of emerging digital technologies. Although a compliance manager should certainly be part of a corporate IRB, he or she should probably not be directing it. In fact, the European Data Protection Board announced in March 2023 that it was concerned about this issue and that data protection officers would be sent

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