


<b>INFORMATION TECHNOLOGY POLICY/PROCEDURE</b>	
<b>OFFICE OF PRIMARY RESPONSIBILITY:</b>  Information Technology	<b>EFFECTIVE DATE:</b> May 22, 2025 <b>REVISION DATE:</b> <b>REPLACES:</b>
<b>SUBJECT: Generative Artificial Intelligence Policy</b>	
<b>SIGNATURE OF APPROVAL:</b>   _____ Tiffany Homler Hawkins Chief Executive Officer, LYNX	

### **Objective**

The Central Florida Regional Transportation Authority (“LYNX”) recognizes the importance of Artificial Intelligence (AI) technology in enhancing productivity and efficiency in the workplace. The purpose of this policy is to establish guidelines and best practices for the responsible use of AI technology within LYNX. By adhering to these guidelines, LYNX aims to maintain the integrity and security of its network, information, and communication and scheduling systems while leveraging AI to improve its productivity.

### **Scope**

This policy applies to all employees, contractors, and third-party service providers who (1) use LYNX’s systems and any AI technology integrated with these systems, (2) otherwise wish to use AI for work purposes (whether on LYNX-owned or personal devices), and/or (3) wish to use AI for any purpose on LYNX-owned devices. This policy must be followed in conjunction with other LYNX policies governing appropriate workplace conduct and behavior. LYNX complies with all applicable federal, state and local laws as they concern the employer/employee relationship, and nothing contained herein should be construed to violate any of the rights or responsibilities contained in such laws.

### **Definitions**

- A. **Artificial Intelligence (AI)** means a machine-based system designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.
- B. **Generative AI** means a type of artificial intelligence which creates new content, such as images, text, music, video, and/or code, as an output (called **Output Data**).
- C. **Human In The Loop (HITL)** refers to humans actively evaluating the output from Generative AI.
- D. **Input Data (or “Input”)** means content that you type into an AI tool or otherwise allow an AI tool to access.

- E. **LYNX Information** means information about LYNX's business, customers, or employees.
- F. **Output Data** is the new content, such as images, text, music, video, and/or code, that is created as an output by a Generative AI tool.
- G. **Personal Data** means data which is linked, reasonably linkable, or relates to an identified or identifiable person or household.

### Policy

LYNX has approved and will approve in the future specific AI tools to be used for limited purposes. The tools and purposes are listed below and described in more detail in this policy. Use of any other AI tools while performing work for LYNX is not permitted without formal advance approval.

### Approved Generative AI Chatbots

Limited use of Generative AI chatbots (GenAI) will be allowed while performing work for LYNX with the approval of the Information Technology Department. The GenAI tools LYNX has approved, their approved users, and the approved use purposes, are as follows:

- **Microsoft Copilot:**
  - **Approved Users:** All
  - **Approved Purposes:** Generally approved for use.
  - **Exceptions:** This tool **may not be used** for any of the following purposes:
    - Human Resources decisions.
    - To provide legal decisions or advice.
    - Any use that would violate LYNX's existing policies or procedures.
    - Any use that would violate a law or legal obligation.
    - **Any images or other content generated for commercial purposes must be submitted to the Marketing Department for prior review.**
  - **Configuration Requirements:** Employees must use their LYNX credentials and account for Microsoft Copilot.
    - **Use of Personal Credentials:** Use of your own personal account or credentials is **strictly prohibited**.

**Even with approved uses of AI, employees must always use their own independent judgment.**

**Please note that the above GenAI tools are only permitted to be used internally within LYNX, and not to interact or otherwise interface with customers.**

### Other Approved AI Tools

LYNX has approved the following additional AI tools to be used under the circumstances and by the users indicated below:

- If an already approved technology integrates AI capabilities, no additional approval is required for its use **so long as the approved technology's AI capabilities have already been subject to LYNX's procurement process outlined in Administrative Rule 4.** However, all other provisions of this policy remain applicable.
- No additional tools are approved at this time.

### Development of AI Tools

LYNX does not currently permit development of new or customized AI tools.

### Using LYNX Credentials

For approved uses, LYNX email addresses, credentials or phone numbers must be used to create an account with these technologies (or if an existing account has already been created for LYNX credentials, that account must be used), unless this policy tells the employee there is an exception.

Where LYNX Credentials are not used to create or use an account for an AI tool, **no LYNX data of any kind may be submitted (copied, typed, etc.) as Input Data into these AI tools or any external platform, such as Instagram, TikTok, Google, etc. If LYNX data of any kind is/was submitted into an AI tool or any external platform (Instagram, TikTok, Google, etc.), the employee must inform their manager or supervisor immediately. Failure to do so will result in corrective action, up to and including termination of employment.**

### Examples

When approved, **acceptable uses** of a GenAI tool may include:

- For general-knowledge questions meant to enhance the employee's understanding on a work-related topic.
- To brainstorm ideas related to projects that employees are working on.
- To create formulas for Excel spreadsheets or similar programs.
- To draft an email or letter (the employee's independent review is still required).
- To summarize online research or to create outlines for content projects to assist in full coverage of a topic. Only content written by employees may be included in a final product.
- To develop or debug code, to be verified before deployment.

**Unacceptable uses** of AI tools include:

- Copying and pasting, typing, or in any way submitting LYNX content or data of any kind into any non-enterprise AI tool (meaning a tool that an employee uses with non-LYNX credentials). This includes customer information, LYNX Information, and Personal Data,
- Using an AI tool to commit a crime or break a law, like plagiarism or violating copyright laws.
- Using an AI tool to discriminate against someone or harm them.

### Principles for Acceptable Use of AI

#### **1. Follow the Law and LYNX's Policies**

The only use of AI that is permitted at LYNX is the use of an AI tool that LYNX has explicitly approved in writing. Employees wishing to use a tool that has not been explicitly approved must inform their manager and the Information Technology Department, in writing, how the tool will be used and by whom. The Information Technology Department will evaluate the request and may reach out to request additional information. A new request must be submitted via help desk and must include:

- a. Name of AI tool.
- b. Intended Use.
- c. Intended Users.
- d. Cost.
- e. Describe the difference between the requested tool and existing tools, and why the intended use cannot be met with existing resources.
- f. Types of Input Data (e.g., email contents, draft emails, policies and procedures, Personal Data, company data – there can be more than one thing listed here).

Unless approved by LYNX, employees may not use AI tools that are freely available on the Internet, and may not use AI to violate the law. This means that employees cannot use AI to do anything that would be a violation of the law if LYNX or its employees did it. This principle drives many other principles that follow and requires that employees understand how AI is accomplishing its tasks and implement appropriate safeguards to ensure that it is not using processes that violate the law or producing results that violate the law.

LYNX's other policies, including its standard for technology acquisition, apply to all technology, including AI tools. LYNX's Information Technology Department reserves the right to revoke authorization or impose restrictions on use of AI tools if they introduce risks that cannot be effectively mitigated to ensure compliance with this policy or other LYNX policies.

## **2. Determine Whether AI Is the Proper Tool.**

Before employees consider using an AI tool for a project, employees need to **define the goal or objective** for the project. Once an employee has determined the objective for the project, the employee must **determine whether AI is an appropriate tool** to accomplish the objective. While the novelty of AI is appealing, the use of AI comes with risks. Often, other tools can be used to effectively accomplish the objective without undertaking the same risks. Before using AI, an employee must evaluate the non-AI tools available to them and confirm that AI is the optimal tool for the project. Factors that must be considered include: (a) is AI the only tool or a far better tool for meeting the goal; (b) what kinds of Input Data will be used and what are the risks using the Input Data; (c) will the results be correct and what can an employee do to make sure everything is correct; (d) if AI produces incorrect results or results that an employee cannot check to make sure are correct what problems could you have.

## **3. Training Data and Data Inputs**

Employees are only allowed to input certain types of data when using an AI tool. If an employee doesn't know whether they are allowed to use a specific type of data with an AI tool, the employee must ask the Information Technology Department.

All content entered into, or generated by, a non-approved AI tool is available to that AI tool, its parent company, and their employees. To ensure that data is not disclosed without authorization, LYNX must strictly follow these rules on which data may or may not be used with AI tools.

**General Rules: What Types of Data Should I Not Use as an Input for AI Tools?**

1. Personal Data should not be used as an input with **any** AI tool (even approved AI tools).
2. LYNX Information should not be used as an input with any AI tool (even approved AI tools).

**What Is Personal Data?**

Personal Data is any information about a person. It can include very sensitive data, like someone's Social Security number, driver's license number, or credit card number. But Personal Data can also be data that we see every day, like someone's name, email address, phone number, or birthday.

**What Is LYNX Information?**

LYNX Information is information about LYNX's business, customers, or employees, that is important to LYNX and that people outside of LYNX are not permitted to access freely. LYNX Information could include things like sales information, company financial information, and specific rules or processes it must follow.

**Rules for Personal Data:** As a default, Personal Data may NOT be input into an AI tool.

**Rules for LYNX Information:** You may not use any LYNX Information or information about LYNX customers in any AI tool without prior written approval from LYNX's Information Technology Department.

**4. Trust and Confirm**

Whenever an employee uses something generated by AI, the employee needs to be able to (1) make sure it is correct; (2) make sure that the AI tool is giving good results and information; and (3) be able to check the source to make sure that any facts and information are true and correct. Outputs from GenAI must be reviewed by a **human** before being used in any official LYNX capacity ("Human in the Loop" or HITL). Documentation of HITL reviews shall be retained according to the appropriate records retention schedule. If the employee can't be sure that the information is correct and show that the information is correct, the employee can't use the outputs from an AI tool for work purposes.

**5. Notice and Transparency**

LYNX will be transparent with individuals about what Personal Data it is collecting about them, how it will be used, and how it will be shared with anyone outside LYNX. To be transparent when using AI, an employee must understand the AI tool, what data is being used, and how the AI tool is using the data, and the employee must be able to accurately describe each of these things so that appropriate disclosures can be made. Any collection and use of Personal Data must be accurately and adequately disclosed in LYNX's Privacy Notice. LYNX may also be required to provide specific notice to its business customers regarding its use of AI tools in providing products and services, especially where products and services are regulated by law.

## **6. Credits and Accountability**

All images and videos created by Generative AI systems must be credited to the specific AI system used. If AI generated text is a significant part of a final product, the AI system must be credited. If a large portion of AI-generated source code is included in a final software product, or if any AI-generated code is used for a critical function, credit must be given through comments in the source code and product documentation. All credits should include the name of the AI system used, along with a “Human in the Loop” (HITL) statement that identifies the employee, department, or group responsible for reviewing and editing the content.

Departments must determine what qualifies as “substantive use” in alignment with the principles in this document and relevant intellectual property laws.

## **7. Fairness**

Regardless of whether the use of an AI tool is technically legal, LYNX will only approve an AI tool if it is confident that its “decisions” will be fair to the people, businesses, industries, or others that will be affected by the AI tool’s decisions.

### **Ethical Use**

Employees must follow LYNX conduct policies and antidiscrimination policies when using AI tools. AI tools must not be used to create content that is inappropriate, discriminatory or otherwise harmful to others or LYNX. If an employee uses an AI tool in a way that isn’t allowed by LYNX’s policies, it will result in corrective action, up to and including termination of employment.

### **Monitoring**

LYNX’s Information Security Policy and relevant monitoring policies still apply when using Generative AI tools with equipment.

### **Security**

AI tools may only be used if LYNX’s systems, property, and all data inputs and outputs are secure. “Secure” means that: (a) the systems, property, and data involved have safety measures in place to keep someone from accessing, using, sharing, deleting, or changing the systems, property, and data; and (b) for any mission-critical systems, that they are backed up and can be brought back online so that the systems and data are available and can be used when needed.

## **8. Data Minimization**

When Personal Data or LYNX Information is approved for use with an AI tool, LYNX will only use the pieces of Personal Data or LYNX Information that are necessary for the AI tool to achieve the desired objective. LYNX will not collect or use additional pieces of Personal Data or LYNX Information that are not necessary. Employees must consider whether they can accomplish the objective with a less sensitive or less intrusive piece of Personal Data (e.g., zip code instead of full address) or LYNX Information, as applicable.

## **9. Compliance With This Policy**

### **Compliance**

All employees must comply with this policy and any applicable laws and regulations governing the use of AI tools. Failure to comply with this policy may result in corrective action, up to and including termination of employment.

### **Review and Revision**

LYNX will periodically review and update this policy to ensure it remains effective and aligned with best practices and changes in AI technology and regulatory requirements.

### **Contact Information**

For questions, concerns, or to report a violation of this policy, please contact the Information Technology Department.

--- Signature Page to Follow ---

By signing below, I certify that I have read, understand, and will comply with this AI Acceptable Use Policy.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_