CreativeX AI Use Statement

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Changes to previous version:	Clarified CreativeX's role as an AI deployer under the EU AI Act; enhanced AI governance responsibilities; reinforced data privacy, bias mitigation, and transparency sections; aligned terminology with client-facing AI messaging playbook; added EU AI Act compliance and future AI use clauses.		

Introduction

The deployment and integration of Artificial Intelligence (AI) technologies offers CreativeX opportunities to streamline administrative processes and enhance operational efficiency through the use of machine learning, computer vision, and natural language processing (Large Language Models (LLMs)) methodologies.

CreativeX recognises the importance of adopting AI technologies to introduce these benefits whilst ensuring their ethical and responsible use to ensure alignment with all appropriate best practice and legislation including the upcoming EU Artificial Intelligence (AI) Act and associated industry guidelines..

This 'AI Use Statement' outlines CreativeX's commitment to harnessing AI in a way that aligns with our core values, it is designed to provide our clients, partners, and stakeholders with a clear understanding of how we use AI to drive innovation while ensuring that its application aligns with ethical standards and respects privacy and fairness.

As AI evolves, so too will our approach, reflecting the latest advancements in technology and regulation. This document and supporting AI policies and procedures will be periodically reviewed to adapt to the changing landscape, ensuring that our AI use remains beneficial and aligned with our strategic goals.

CreativeX AI Use Principles

1. **AI Models** - CreativeX does not utilise its own in-house AI models* but instead uses a selection of, third party AI providers and open source models during the review of client creative (marketing images and videos) to; a) Extract creative elements through the use of Optical Character Recognition (OCR), text classification, object detection, face detection, speech-to-text, shot detection, and, b) query the contents of client creative (marketing images and videos) through the use of Generative AI (Large Language Model (LLM)) based methods.

   CreativeX uses Generative AI (LLMs) for information analysis purposes to support the delivery of the provided service. CreativeX does not use Generative AI to generate images or videos. **Client data is never used to train or fine-tune any AI models.**

2. **AI Governance and Oversight** - A CreativeX AI Committee has been established in order to foster a culture of trust and transparency whilst ensuring ethical and responsible AI use within CreativeX through; strategic alignment and governance, AI risk management and compliance, alignment with applicable legal and regulatory requirements, cross functional collaboration and performance monitoring & accountability. The CreativeX AI Governance Committee reviews and approves all AI use proposals within CreativeX. As a deployer under the EU AI Act, the committee oversees the responsible integration and use of third-party AI systems., including maintaining an AI Use Registry, performing AI Impact Assessments, documenting transparency measures, and ensuring deployer-level compliance obligations are met across all client-facing and internal tools.

3. **Model Training** - The third party AI models leveraged by CreativeX are pre-trained by either third party AI providers or through open source solutions. CreativeX uses these models on an inference-only basis. CreativeX does not use client data to train or fine-tune AI models. All model providers undergo technical and security due diligence to ensure data handling meets CreativeX standards.

4. **Data Privacy and Security** - Safeguarding client data is a core priority for CreativeX. CreativeX designs and operates its third party AI provider and open source AI model services in alignment with applicable data protection laws and industry best practices, including the principles of data minimisation, purpose limitation, confidentiality, and security. CreativeX implements robust technical and organisational measures to protect data processed within AI tooling. These measures include controls relating to data ownership and handling, encryption of data in transit and at rest, access management, secure data retention/deletion and bias mitigation considerations.

   CreativeX conducts regular security and risk assessments of its systems and AI supply chain. This includes security reviews of third-party AI providers, ongoing monitoring for continued alignment with recognised assurance frameworks such as ISO 27001, SOC 2, and other relevant standards, and the application of contractual, technical, and organisational safeguards to manage third-party risks. Client data is used solely for analysis and is never used to train or fine-tune AI models.

5. **Bias Mitigation, Fairness and Human Oversight** - CreativeX actively seeks to minimise bias and promote fairness in the analysis of client data. Certain third-party AI providers include Human-in-the-Loop (HITL) review as part of their quality and fairness controls. CreativeX assesses vendors for compliance with ethical, security, and regulatory standards, including the existence of appropriate HITL controls.

3. EU AI ACT ALLIGNMENT

CreativeX is actively preparing for compliance with the EU Artificial Intelligence Act. This includes risk classification of AI systems, transparency documentation, and **documented** AI impact assessments. A structured roadmap is maintained to ensure all AI activities remain compliant ahead of enforcement. CreativeX's current use of AI to deliver its provided services is not considered high-risk under the EU AI Act.

4. TRANSPARENCY AND CLIENT COMMUNICATION

CreativeX maintains clear public disclosures regarding its AI use, including this statement. Our commercial, legal, and technical teams are aligned on consistent client-facing messaging to ensure trust and transparency in AI capabilities. We communicate changes to AI use that may affect clients through updated disclosures or contractual terms where appropriate.

These disclosures are reviewed periodically to ensure alignment with regulatory expectations for clarity, accuracy, and technical precision.

3. FUTURE AI USE

Should CreativeX introduce Generative AI capabilities in the future, for example, in internal workflows or non-client-facing automation - these will be used under strict governance controls and without the use of client data. Any future client-facing features involving Generative AI will be communicated openly and subject to legal and contractual review before deployment.

* CreativeX defines 'in-house AI models' as custom AI models developed internally by CreativeX rather than third party developed models or pre-trained models developed by external providers.

Document history

Version:	Date:	Author:	Summary of changes:
1.0	14/10/2024	Tom Bram...	Initial draft produced.
2.0	28/01/2026	Dana Corr...	Clarified CreativeX's role as an AI deployer under the EU AI Act; enhanced AI governance responsibilities; reinforced data privacy, bias mitigation, and transparency sections; aligned terminology with client-facing AI messaging playbook; added EU AI Act compliance and future AI use clauses.