

AI Ethics & Responsible Use Policy

*Our framework for ethical, human-centred and trustworthy AI,
aligned with European values*

InnovHub (InnovHub) · Kingdom of the Netherlands · 2026–2028

This policy is grounded in Dutch and European law, including:

- Regulation (EU) 2024/1689 — the Artificial Intelligence Act
- EU Charter of Fundamental Rights, Articles 1, 8, 11 & 21
- Regulation (EU) 2016/679 (GDPR) and the Dutch Uitvoeringswet AVG (UAVG)
- Ethics Guidelines for Trustworthy AI (EU High-Level Expert Group on AI, 2019)
- Council of Europe Framework Convention on AI, Human Rights, Democracy & the Rule of Law (2024)
- OECD Principles on AI (2019, updated 2024) and UNESCO Recommendation on AI Ethics (2021)
- Uitvoeringswet AI-verordening — Dutch AI Act implementation act (in legislative process, 2026)

1. Statement of Commitment

InnovHub is committed to the ethical, human-centred and trustworthy use of artificial intelligence (AI) across all of its activities — entrepreneurship support, non-formal education, digital transformation, and AI, AR and VR integration into learning and community programmes.

InnovHub adopts AI as a tool to expand opportunity and inclusion, never as a substitute for human judgement, dignity or care. This commitment applies equally to InnovHub's own use of AI in its operations and project delivery, and to the AI-enabled content, tools and technologies it introduces to beneficiaries, including young people, NEETs, migrants, women and other participants in vulnerable situations.

This policy applies in addition to, and does not replace, InnovHub's Gender Equality Plan and Child Protection & Safeguarding Policy, which continue to set the minimum standard wherever AI use intersects with the rights of minors or the principles of equality and inclusion.

2. Legal and Policy Framework

This policy is drafted to comply with the AI governance framework applicable in the Kingdom of the Netherlands, as well as relevant European and international instruments:

European and international instruments

- Regulation (EU) 2024/1689 (the "AI Act") — the EU's horizontal legal framework for AI, prohibiting certain AI practices since 2 February 2025, applying obligations to general-purpose AI models since 2 August 2025, and applying obligations for high-risk AI systems from 2 August 2026.
- EU Charter of Fundamental Rights, Articles 1 (dignity), 8 (data protection), 11 (freedom of expression and information) and 21 (non-discrimination).
- Regulation (EU) 2016/679 (GDPR) and its Dutch implementing act, the *Uitvoeringswet Algemene Verordening Gegevensbescherming* (UAVG).
- Ethics Guidelines for Trustworthy AI, published by the European Commission's High-Level Expert Group on AI (2019), which structure the seven key requirements reflected in Section 4 of this policy.
- Council of Europe Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law (opened for signature 2024).
- OECD Principles on Artificial Intelligence (2019, updated 2024) and the UNESCO Recommendation on the Ethics of Artificial Intelligence (2021).

Dutch national legislation and policy

- *Uitvoeringswet AI-verordening* — the draft Dutch AI Act implementation act, submitted for public consultation on 20 April 2026, which designates the *Autoriteit Persoonsgegevens* (AP) and the *Rijksinspectie Digitale Infrastructuur* (RDI) as the coordinating national authorities for AI supervision, alongside sector-

- specific market surveillance authorities. InnovHub monitors the progress of this legislation and will update this policy once it is formally adopted.
- Uitvoeringswet AVG (UAVG) — the Dutch GDPR implementing act, governing the lawful processing of personal data, including data processed by or through AI systems.
- Nederlandse AI-strategie and the Dutch Digitalisation Strategy, promoting human-centred, safe and inclusive AI adoption.
- Algoritmeregister (the Dutch public register of algorithms used by public-sector organisations) — InnovHub follows the same transparency principle voluntarily as good practice for any algorithmic tool used in its project delivery.

This AI Ethics & Responsible Use Policy is a living document, reviewed as Dutch and EU AI legislation matures, and is designed to meet the responsible-innovation expectations of Horizon Europe, Erasmus+ and Creative Europe funding programmes.

3. Scope

This policy applies to:

- All InnovHub staff and management;
- Volunteers, freelancers, trainers and interns engaged by InnovHub;
- Partner organisations, sub-grantees and associates using AI on InnovHub's behalf within joint projects;
- Any AI system, tool, model or AI-enabled feature (including generative AI, AR/VR applications with AI components, chatbots, analytics and automated decision-support tools) used in InnovHub's operations, training, entrepreneurship, digital, STEAM or community activities;
- Every beneficiary and participant who interacts with an AI-enabled activity delivered or facilitated by InnovHub.

An **"AI system"** means a machine-based system as defined in Article 3(1) of the AI Act — a system that infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions.

4. Key Principles

InnovHub's approach follows the seven key requirements for trustworthy AI set out by the European Commission's High-Level Expert Group on AI:

- Human agency and oversight: AI supports, and never replaces, human decision-making in matters affecting people's rights, opportunities or safety.
- Technical robustness and safety: AI tools are tested, monitored and used within their proven limits, with safeguards against error, misuse and manipulation.
- Privacy and data governance: personal data processed by or through AI is handled lawfully, fairly and with the minimum necessary scope, in line with the GDPR and UAVG.

- **Transparency:** people are told when they are interacting with AI or AI-generated content, and how an AI-supported decision affecting them was reached.
- **Diversity, non-discrimination and fairness:** AI tools and content are reviewed for bias, and are not used in ways that disadvantage women, migrants, NEETs, people with disabilities, or any other group.
- **Societal and environmental well-being:** AI adoption considers its impact on participants, staff, communities and the environment, not only efficiency.
- **Accountability:** clear ownership, documented decisions, and accessible channels for raising concerns about AI use.

5. Definitions

Core terms (aligned with the AI Act)

AI system: a machine-based system that operates with varying levels of autonomy and infers, from the input it receives, how to generate outputs such as content, predictions, recommendations or decisions influencing physical or virtual environments (AI Act, Art. 3(1)).

General-purpose AI (GPAI) model: an AI model, such as a large language model, that displays significant generality and can competently perform a wide range of tasks — for example, the assistants and content generators InnovHub staff may use for drafting, translation or research support.

Prohibited AI practice: an AI use banned under Article 5 of the AI Act, including social scoring, manipulative or deceptive techniques that impair informed decision-making, and — of direct relevance to InnovHub's youth and education work — the use of emotion-recognition systems in educational or workplace settings and AI systems that exploit the vulnerabilities of children or other vulnerable groups.

High-risk AI system: an AI system used in a context listed in Annex III of the AI Act (for example, in employment, education or access to essential services) that is subject to enhanced obligations on risk management, data governance, transparency and human oversight.

Automated decision-making: a decision made, in whole or in part, by an algorithm without meaningful human involvement.

Algorithmic bias: a systematic tendency of an AI system to produce outputs that unfairly disadvantage a person or group.

Deepfake / synthetic content: AI-generated or manipulated image, audio or video content that resembles real people, places or events; the AI Act requires such content to be clearly labelled as AI-generated.

6. Roles and Responsibilities

Founder & Director (Accountable Officer)

The Founder & Director of InnovHub approves this policy, allocates the resources necessary for its implementation, takes ultimate responsibility for InnovHub's compliance with the AI Act and related legislation, and receives an annual AI governance report.

Designated AI Ethics Officer

InnovHub's Digitalisation Lead acts as the Designated AI Ethics Officer, responsible for day-to-day compliance: screening new AI tools before adoption, maintaining the AI tools and activities register, acting as the first point of contact for staff, freelancers and partners on AI-related questions, and coordinating any escalation to the Autoriteit Persoonsgegevens (AP) or the Rijksinspectie Digitale Infrastructuur (RDI).

All staff, volunteers, freelancers and partners

Every person covered by the scope of this policy has a personal duty to use AI tools responsibly, to disclose AI-generated content where required, and to report any concern about an AI tool or its outputs promptly in accordance with Section 13. Partner organisations and sub-grantees must either adopt this policy or demonstrate an equivalent standard before collaborating with InnovHub on an AI-enabled activity.

7. Code of Conduct for AI Use

All staff, freelancers and partners using AI on behalf of InnovHub must:

- Use AI as an aid to human work, always reviewing and taking responsibility for any AI-generated output before it is used, published, or acted upon;
- Disclose to participants, partners and funders when content, translations, images or decisions have been materially generated or supported by AI;
- Never input personal data of participants, staff or partners — and never input data belonging to minors — into a public, non-vetted AI tool without an appropriate data processing safeguard in place;
- Never use AI for social scoring, covert manipulation, biometric categorisation, or emotion-recognition of participants, in line with the prohibited practices under Article 5 of the AI Act;
- Never present AI-generated content as the verified word or work of a real person, and never create or share deepfake content involving participants, staff, or partners;
- Respect intellectual property and copyright when using generative AI tools, and verify factual claims in AI-generated material before relying on it in a professional or educational context;
- Apply the same non-discrimination standard to AI-assisted recruitment, assessment or participant selection as to any human-led process, per InnovHub's Gender Equality Plan;
- Ensure any AI tool used directly with children or young people under 18 also complies with InnovHub's Child Protection & Safeguarding Policy, including safe, moderated and age-appropriate use.

8. Risk Classification and Assessment

Before adopting or introducing any new AI tool into an activity, InnovHub screens it against the AI Act's risk tiers:

- Unacceptable risk — prohibited practices under Article 5: the tool is not adopted, without exception.
- High risk — tools used in contexts such as education, employment or eligibility assessment (AI Act, Annex III): adopted only with a documented risk assessment, human oversight measures, and data governance safeguards in place before use.
- Limited risk — chatbots, AI content generators, or AI-based recommendation features: adopted with clear disclosure to users that they are interacting with AI, per the transparency obligations of Article 50.
- Minimal risk — general productivity tools with no material impact on participants' rights or opportunities: adopted under InnovHub's standard vetting, per Section 12.

A documented risk assessment is completed and logged by the Designated AI Ethics Officer before any AI tool is used at scale with participants, and reviewed whenever the tool, its provider, or its use case changes materially.

9. Data Governance and Privacy

- Lawful basis for processing personal data through an AI tool is identified and documented before use, in line with the GDPR and UAVG;
- Data minimisation: only the data necessary for the AI tool's stated purpose is provided to it; sensitive categories of data are not processed by AI tools without an explicit lawful basis and additional safeguards;
- Where an AI tool is likely to result in a high risk to individuals' rights, a Data Protection Impact Assessment (DPIA) is carried out before deployment;
- Retention: outputs and logs from AI tools are retained only as long as necessary, and are stored securely with access limited to those who need it;
- Data subject rights — including access, correction, objection and human review of an automated decision — are respected in accordance with the UAVG and Article 22 GDPR.

10. Transparency, Explainability and Human Oversight

- Participants and partners are informed, in plain language, whenever they are interacting with an AI system, a chatbot, or AI-generated content, per the transparency obligations of the AI Act;
- AI-generated or AI-modified images, audio, video and text used in InnovHub publications or project materials are labelled as such;
- No decision materially affecting a participant's access to InnovHub's activities, opportunities or support is made solely by an AI system: a human reviews and can override any AI-supported recommendation;
- Participants may request a plain-language explanation of how an AI tool contributed to a recommendation or output that concerns them, and may ask for human review.

11. AI in Training, Digital and STEAM Activities

Given InnovHub's active integration of AI, AR and VR into entrepreneurship, non-formal education and STEAM programming, the following safeguards apply specifically to activities involving participants:

- AI and AR/VR tools introduced in workshops and training are vetted for age-appropriateness, safety and pedagogical value before use;
- Where participants include persons under 18, AI tool use follows the two-adult and safe-recruitment principles of InnovHub's Child Protection & Safeguarding Policy, with sessions moderated by a safeguarding-trained facilitator;
- Participants are taught not only how to use AI tools, but how to critically evaluate AI-generated content — supporting digital and AI literacy alongside digital skills;
- No profiling or automated scoring of NEETs, migrants, women or other vulnerable participants is carried out without explicit, informed consent and a clear, participant-facing explanation of its purpose;
- Gender-responsive and disability-inclusive design is applied to AI-enabled activities, consistent with InnovHub's Gender Equality Plan.

12. Procurement, Vendors and Third-Party AI Tools

- AI vendors and tools are assessed for their own AI Act, GDPR/UAVG and security compliance before being adopted for use with InnovHub data or participants;
- A data processing agreement is put in place with any AI vendor that processes personal data on InnovHub's behalf;
- Preference is given to providers that offer clear documentation of training data sources, model limitations, and safety testing;
- Free or consumer-grade AI tools are used only for low-risk, non-personal-data tasks unless a vetted, appropriately licensed alternative is unavailable.

13. Monitoring, Incident Reporting and Response

Any concern about an AI tool, its output, or its use — including suspected bias, discrimination, a data breach, or a possible prohibited practice — must be reported immediately to the Designated AI Ethics Officer (or, if the Officer is implicated, to the Founder & Director) and recorded on the internal AI Concern/Incident Log within 24 hours.

- Do not attempt to conceal or independently resolve a suspected AI-related data breach — escalate immediately so that GDPR/UAVG breach-notification timelines can be met;
- Where an AI-related incident may affect a minor, InnovHub's Child Protection & Safeguarding Policy reporting procedure (Section 10 of that policy) is followed in parallel;

- Where an incident involves a possible prohibited practice or a serious risk under the AI Act, the matter is escalated, where appropriate, to the Autoriteit Persoonsgegevens (AP) or the Rijksinspectie Digitale Infrastructuur (RDI);
- No person who raises an AI-related concern in good faith will face retaliation.

14. Contacts and Referral Authorities

Role / Body	Details
Autoriteit Persoonsgegevens (AP) — Dutch Data Protection Authority; coordinating AI supervisory authority	www.autoriteitpersoonsgegevens.nl
Rijksinspectie Digitale Infrastructuur (RDI) — coordinating AI supervisory authority and AI Act single point of contact	www.rdi.nl
European AI Office — supervision of general-purpose AI models at EU level	digital-strategy.ec.europa.eu/en/policies/ai-office

Internal contacts

Role / Body	Details
Founder & Director, InnovHub	Ahmet Kocatürk
Designated AI Ethics Officer / Digitalisation Lead	Arsoy Ar

15. Monitoring and Review

This policy is reviewed annually by the Founder & Director of InnovHub, and updated without delay whenever Dutch or EU AI legislation changes — in particular once the Uitvoeringswet AI-verordening is formally adopted — or whenever monitoring reveals a gap in current practice. It is published to all staff, external experts and partners, and shared with project partners as the minimum common standard for any AI-enabled activity.

Declaration of Commitment

InnovHub, commits to the ethical, transparent and human-centred use of artificial intelligence across all its activities, partnerships and EU-funded projects.