

EIOPA Generative AI survey

Fields marked with * are mandatory.

Information about the reporting organisation

Privacy Statement

[Privacy Statement.pdf](#)

* Legal Entity Identifier (LEI)

* Name of the reporting organisation

* Jurisdiction of establishment

* Contact details (email and telephone)

* Annual Gross Written Premiums (euros)

* Line of Business activity

* Would you be willing to engage with EIOPA on follow-up discussions?

* Date of submission

Instructions

Background

Rapid technological developments can have a significant impact in the insurance sector. To keep pace with this rapid change and in order to make sure that the regulatory and supervisory frameworks account for both the opportunities and risks that innovation brings, EIOPA has developed the present survey.

The results of the survey are also used by EIOPA to comply with the following Articles of EIOPA's Regulation: Article 9(a) which states that EIOPA should collect, analyse and report on consumer trends; Article 8(1)(f) which requires EIOPA to monitor and assess market developments, including in the area of innovative financial services; and Article 31 which states that EIOPA should fulfil a coordination role and should centralise information received.

Objective

The objective of the survey is to develop a deeper understanding of the current and expected use of Generative AI systems in insurance, how its implementation differs from traditional AI systems, and what governance and risk management measures insurance undertakings are developing to ensure a responsible use of this technology.

The questions will be analysed on an aggregated manner and EIOPA will not use the answers to the questionnaire to assess the compliance of individual undertakings to regulations, either current or under discussion.

By collecting harmonised data at European level, the findings of the survey will enable EIOPA to conduct an evidence-based approach to the supervision of the use of modern technologies in the European insurance sector. It will also help EIOPA to identify potential obstacles preventing stakeholders to harness the benefits of Generative AI systems. This will support EIOPA in creating better outcomes for consumers and a higher level of consumer protection in the EU.

Definitions and scope

For the purpose of this survey, the following definitions based on the AI Act are used:

AI systems: 'AI system' means a machine-based system that is 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.[1]

[1] Please note that the European Commission's AI Office has published guidelines on the definition of AI systems: <https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-ai-system-definition>

Generative AI system (based on the AI Act definition of general-purpose AI models):Means an AI model, including where such an AI model is trained with a large amount of data using self-supervision at scale, that displays significant generality and is capable of competently performing a wide range of distinct tasks regardless of the way the model is placed on the market and that can be integrated into a variety of downstream systems or applications.

Nota Bene: While it is acknowledged that the definition of General Purpose AI models is not exactly the same as Generative AI, in this survey they have been used indistinctly and therefore this definition captures different types on Generative AI systems and applications with different levels of automation and integration, such as the so-called large language models (LLMs), or Generative AI assistants (Augmented AI) or Generative AI Agents (Agentic AI).

The self-usage by staff of Generative AI systems (e.g. ChatGPT) should be left out of scope of this survey, except in specific questions about self-usage by staff. Self-usage by staff should be understood as uses of Generative AI systems that have not been purchased, developed, or authorised by the organisation.

How to complete this survey

The survey should ideally be completed by or with the support of staff in your organisation with experience in the development, implementation, or monitoring of AI systems.

The survey covers both life insurance and non-life insurance lines of business. In case your organisation is only active in non-life insurance lines of business or in life insurance lines of business, please leave blank the questions that refer to the line of business you are not active in.

The survey covers the commercial relationship of your organisation with both retail and corporate customers (e.g. regarding the questions about use cases), unless otherwise specified in the question.

Please answer to the questions of this survey based on the situation in your organisation in 2025.

The information provided in the questions that include a drop-down list may be an approximation to the situation that you have observed in your organisation. Please try to complete the questions on a best effort basis.

Please use the text box below the questions that include a drop-down list to provide comments and explain the situation in your organisation. Making references to practical examples (e.g. specific use cases, governance practices, opportunities, challenges etc.) would be particularly useful.

Timeline

- 15 May 2025 - Launch of the survey
- 15 July 2025 - Deadline to submit the responses

Strategy and objectives

1. From a corporate strategy perspective, what is the primary driver for adopting Generative AI systems in your organisation? (please rank them from 1-8, with 1 being the most relevant and 8 the least relevant)

Driver	Answer
Improving efficiency and reducing costs	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8
Enhancing customer experience	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8
New revenue generation	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8
Improving decision-making with better data insights	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8

Gaining a competitive edge in the market	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8
Enhancing security and risk management	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8
Not applicable, we do not use or plan to use Generative AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8
Other (please specify)	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8

Please briefly explain your response:

**2. What challenges are you facing in implementing Generative AI systems in your organisation?
(please rank them from 1-9, with 1 being the most relevant and 9 the least relevant)**

Challenges	Answer
------------	--------

Lack of skilled talent	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9
High implementation costs	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9
Inappropriate IT infrastructure	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9
Data privacy and security concerns	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9

<p>Lack of clarity around potential use cases</p>	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9
<p>Regulatory compliance issues</p>	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9
<p>Corporate culture (e.g. resistance to change within the organisation)</p>	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9
<p>Not applicable, we do not use or plan to use Generative AI systems</p>	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9

Other (please specify)

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9

Please briefly explain your response:

**3. How are you developing or planning to develop Generative AI systems in your organisation?
(please select all the appropriate options):**

- We are developing Generative AI systems entirely in-house
- We are purchasing off-the-shelf solutions from third-party providers
- We are developing Generative AI systems in-house, in collaboration with third-party providers
- We are developing Generative AI systems in-house, based on a Generative AI system developed by a third-party service providers, but without additional support from third-party service providers
- Not applicable, we do not use or plan to use Generative AI systems
- Other (please specify)

Please briefly explain your response:

4. What data sources are being used to train the Generative AI systems that you use or plan to use in your organisation (please select all the appropriate options)?

- We use Generative AI systems pretrained only with third-party data
- We use Generative AI systems pretrained with third-party data, and then we finetune it by retraining it with our own proprietary data
- We use Generative AI systems pretrained with third-party data, and then we combine it with other sources using Retrieval-Augmented Generation (RAG), embedding or similar techniques
- Not applicable, we do not use or plan to use Generative AI systems
- Other (please specify)

Please briefly explain your response:

Use Cases Across the Insurance Value Chain

5. Is your organisation currently using or expects to use in the next 3 years AI systems (other than Generative AI systems)?

- Yes, we are already using AI systems
- We are not using AI systems yet, but we expect to use it within the next 3 years
- We are not using AI systems, and we do not expect to use it within the next 3 years
- Other (please specify)

Please briefly explain your response:

6. Is your organisation currently using or expects to use in the next 3 years Generative AI systems?

- We are already using Generative AI systems
- We are not using Generative AI systems yet, but we expect to use it within the next 3 years
- We are not using Generative AI systems, and we do not expect to use it within the next 3 years
- Other (please specify)

Please briefly explain your response:

7. Other than cross-cutting uses such as for human resources or cybersecurity purposes, in which of the following areas of the insurance value chain are you using or expect to use Generative AI systems? Please select all the relevant options

Area of the value chain	Answer
Product development	<ul style="list-style-type: none"><input checked="" type="radio"/> we are already using it in this area<input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years<input type="radio"/> no plans to use it in this area within the next 3 years
Pricing and underwriting	<ul style="list-style-type: none"><input checked="" type="radio"/> we are already using it in this area<input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years<input type="radio"/> no plans to use it in this area within the next 3 years
Sales and distribution	<ul style="list-style-type: none"><input checked="" type="radio"/> we are already using it in this area<input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years<input type="radio"/> no plans to use it in this area within the next 3 years

Customer service	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Claims management	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Fraud detection	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Not applicable, we do not use or plan to use Generative AI systems	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Other (please specify)	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years

Please briefly explain your response:

8. Other than cross-cutting uses such as for human resources or cybersecurity purposes, where you use Generative AI systems in specific lines of business, please indicate in which lines of business do you use or plan to use Generative AI. Please select all the relevant options

Line of Business	Answer
Life insurance	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years

Non-Life insurance	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Non-Life insurance: Motor insurance	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Non-Life insurance: Household insurance	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Non-Life insurance: Accident and Health insurance	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Not applicable, we do not use or plan to use Generative AI systems	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years
Other (please specify)	<input type="radio"/> we are already using it in this area <input type="radio"/> not yet using it in this area, but we expect to use it within the next 3 years <input type="radio"/> no plans to use it in this area within the next 3 years

Please briefly explain your response:

9. Based on their level of automation, Generative AI systems may be divided between:

- Assisted Generative AI (Foundational models), where the Generative AI system requires human input for content generation based on prompts/questions generated by staff (e.g. Chat GPT)**
- Semi-Autonomous Generative AI (Gen AI Assistants), where the Generative AI system generates full outputs (e.g. contract, next best action recommendation etc.) with some level of automation but still requires human validation.**
- Autonomous Generative AI (Agentic AI), where the Generative AI systems is capable of autonomous decision-making and performing tasks with minimal or no human intervention.**

Which of the following statements better reflects the current and expected situation in your organisation?

	Current situation	Expected situation in next 3 years
Our organisation mostly uses Assisted Generative AI	<input type="checkbox"/>	<input type="checkbox"/>
Our organisation mostly uses Semi-Autonomous Generative AI	<input type="checkbox"/>	<input type="checkbox"/>
Our organisation mostly uses Autonomous Generative AI	<input type="checkbox"/>	<input type="checkbox"/>
Our organisation uses a mix of Generative AI tools with varying levels of automation	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable, we do not use or plan to use Generative AI systems	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Please briefly explain your response:

10. Is your organisation currently using or expects to use in the next 3 years Generative AI systems only for internal processes, only for consumer-facing applications, or for both? Please select all the appropriate options

	Current situation	Expected situation in the next 3 years
We use Generative AI systems for internal processes, such as improving operational efficiency and decision-making	<input type="checkbox"/>	<input type="checkbox"/>
We use Generative AI systems for consumer-facing applications, such as enhancing customer service	<input type="checkbox"/>	<input type="checkbox"/>
We use Generative AI systems for consumer-facing applications, such as creating personalized products and services	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable, we do not use Generative AI systems	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify)	<input type="checkbox"/>	<input type="checkbox"/>

Please briefly explain your response:

11. Specifically for consumer-facing use cases, please explain three of the most relevant Generative AI use cases your organisation is using or expects to use within the next 3 years. For each use case, please provide the following information:

- If it is already being used, or it is at a proof-of-concept stage
- In which area of the value chain and line of business it is used or is expected to be used
- The level of automation (see question 9)
- Briefly explain the purpose and the output of the use case

	Use Case Name	Level of development	Area of the value chain and line of business	Level of automation	Purpose and the output of the use case
Use Case 1					
Use Case 2					
Use case 3					

12. Specifically for internal processes and back-office operations use cases, please explain three of the most relevant Generative AI use cases your organisation is using or expects to use within the next 3 years. For each use case, please provide the following information:

- If it is already being used, or it is at a proof-of-concept stage
- In which area of the value chain and line of business it is used or is expected to be used
- The level of automation (see question 9)
- Briefly explain the purpose and the output of the use case

	Use Case Name	Level of development	Area of the value chain and line of business	Level of automation	Purpose and the output of the use case
Use Case 1					
Use Case 2					
Use case 3					

13. Agentic AI can commonly be understood as Generative AI systems capable of autonomous decision-making and performing tasks with minimal or no human intervention; how do you expect Agentic AI will impact the insurance sector? How long do you expect until Agentic AI becomes widely used in the insurance sector? Which areas of the insurance value chain will be most affected? What challenges and opportunities do you foresee in integrating Agentic AI into your business model?

Governance and Risk Management

14. Does your organisation have a specific policy governing the use of AI systems and Generative AI systems? (please select the most relevant option)

- The use of AI systems (including Generative AI systems) in our organisation is covered by non-AI specific policies such as the Data Strategy, the IT Strategy etc.
- We have a specific policy for AI systems which covers all types of AI systems (i.e. including Generative AI systems), but not a specific one for Generative AI systems
- We have a specific policy for the use of AI systems as well a specific one for Generative AI systems
- We do not have AI-specific policies yet, but we are planning to develop one in the next 3 years
- Not applicable, we do not use or plan to use Generative AI systems
- Other (please specify)

Please briefly explain your response:

15. What are your main concerns / risks regarding the use of Generative AI systems in your organisation (for each option choose from 1 to 5, with 1 being not relevant and 5 very relevant)?

Concerns / risks	Answer
Hallucinations and unexpected behaviours	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Intellectual property violations from third parties	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5

Our own companies' intellectual property and data being stolen	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
IT and cyber security risks	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Over-reliance on third-party service providers	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Ethical issues (e.g., bias, fairness)	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Lack of transparency / information sharing from third-party service providers	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Lack of explainability of Generative AI systems outputs	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Difficulty in establishing clear accountability frameworks	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5

Model performance not meeting initial expectations (e.g., accuracy, consistency, robustness)	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Lack of oversight of data used to pre-train Generative AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Lack of ground truth to test new AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Carbon footprint / environmental considerations	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Negative impact on internal workflows or employee roles	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Legal liability	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Data protection concerns	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5

Not applicable, we do not use Generative AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5
Other (please specify)	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5

Please briefly explain your response:

16. Has your organisation developed any policies or guidance addressing the self-usage by staff of Generative AI systems?

- We have developed internal policies on how and when Generative AI systems may be used
- No specific policy in place yet, but we expect to develop one within the next 3 years
- No specific policy, and we do not expect to develop one within the next 3 years
- Not applicable, we do not use Generative AI systems
- Other (please specify)

Please briefly explain your response:

17. What specific governance and risk management measures do you have in place to address the reliance on third-party service providers of Generative AI systems? (please rank them from 1-7, with 1 being the most relevant and 7 the least relevant)

Measure	Answer
We conduct rigorous testing of third-party Generative AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7

	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7
We conduct audits and due diligence on our third-party service providers	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7
We rely on contractual agreements and service level agreements (SLAs) with our third-party providers	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7
We have developed robust contingency plans to address potential failures of third-party Generative AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7
We use Generative AI systems from several third-party service providers, in order to avoid overreliance on one service provider	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7
Not applicable, we do not use or plan to use Generative AI systems	<input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7

Other (please specify)

- 1
- 2
- 3
- 4
- 5
- 6
- 7

Please briefly explain your response:

18. The provisions of the AI Act regarding Generative AI systems (referred in the AI Act as General-Purpose AI systems) are mainly addressed to service providers / “developers”; how useful are these provisions of the AI Act for “users” of these tools? (select the most relevant answer)

- Very Useful: The provisions ensure that AI systems used by insurance undertakings meet high standards of safety and transparency to users, thus enhancing trust and reducing operational risk
- Somewhat Useful: While they help insurance undertakings develop a framework for responsible AI use, it would be more helpful if the requirements for third-party providers / “developer” were more detailed
- Neutral: The provisions have a small impact on insurance undertakings, as they address responsibilities of third-party providers / “developers” not so relevant for insurance undertakings
- Not sufficiently useful: third-party providers / “developer” should be required to provide significantly more information to the users of their Generative AI systems such as insurance undertakings
- Unhelpful: The provisions are seen as an administrative burden and create significant barriers and costs for insurance undertakings
- Not applicable, we do not use or plan to use Generative AI systems
- Other (please specify)

Please briefly explain your response:

19. Please briefly describe the different governance and risk management approaches needed for Generative AI systems compared to “traditional AI systems” (e.g. supervised machine learning approaches); please briefly explain the main differences and how do you address them in your organisation, if possible, for each of the following AI governance principles:

- Proportionality
- Transparency and explainability
- Fairness and ethics
- Data Governance
- Human oversight
- Documentation and record keeping
- Accuracy, robustness, and cybersecurity

20. **Carbon footprint:** Please briefly describe how your organisation addresses the potential environmental impact related to the use of Generative AI systems. Please explain how you monitor this impact, any measures you may have adopted to mitigate this impact, as well as any difficulties you may have identified in this area.

21. Please use the box below to raise any other issues about Generative AI systems that are not covered in the present survey, but which you consider that are relevant for your organisation or the insurance sector as whole.