



Title: AI Data Protection and Privacy Policy

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Review: This document is subject to a periodic review as per amendments of university policies and regulations

Gulf University adheres to all laws, regulations, resolutions, and instructions issued by the Higher Education Council and to all applicable national regulatory frameworks in the Kingdom of Bahrain.

1. Purpose

The purpose of this policy is to establish principles and guidelines for the responsible, secure, and transparent use of Artificial Intelligence (AI) tools at Gulf University. It details principles to accomplish secure, transparent, and robust data handling practices across all academic and administrative operations.

2. Scope

The document applies to the use of AI tools by all faculty, staff, students, researchers, and third-party vendors operating within or on behalf of Gulf University.

3. Acronyms

GU	Gulf University
AI	Artificial Intelligence
BQA	Education and Training Quality Authority
HEC	Higher Education Council
PDPL	Personal Data Protection Law
PII	Personally Identifiable Information

4. Definitions

Artificial Intelligence (AI): Artificial Intelligence refers to computer systems or software capable of performing tasks that typically require human intelligence, including but not limited to generative AI, machine learning models, and automated decision-making systems.

Data Protection: Data Protection is the process of safeguarding important information from corruption, compromise, or loss, ensuring compliance with legal and institutional requirements.

Enterprise AI Tools: Enterprise AI Tools refer to AI applications and platforms approved or officially used by Gulf University for institutional purposes , featuring contractual data protection safeguards.

Personally Identifiable Information (PII): Personally Identifiable Information describes any data that could potentially identify a specific individual, including names, student ID numbers, contact details, academic records, and biometric data.

Public AI Tools: Public AI Tools are third-party AI applications available to the general public (free or paid) that are not governed by a formal institutional contract with Gulf University.

5. Policy Principles

5.1 Preamble:

GU commits that

- I. Users shall abide by their status, regulations, policies, and procedures of the University that may be subject to periodic reviews and amendments.
- II. Users shall report any suspected data privacy violations involving AI tools immediately to the relevant authorities.

Section (A): Data Classification and AI Usage

5.2 Public Data

- I. Users may input public data (e.g., published research, public website content, general inquiries) into both Public AI Tools and Enterprise AI Tools.
- II. Users shall verify the accuracy of AI-generated content derived from public data before official use.

5.3 Internal and Confidential Data

- I. Users shall not input internal or confidential data (e.g., unpublished research, internal memos, financial records) into Public AI Tools under any circumstances.
- II. Users may process internal and confidential data using approved Enterprise AI Tools, subject to departmental guidelines and IT security protocols.

5.4 Highly Sensitive Data and PII:

- I. Users shall strictly prohibit the input of highly sensitive data and PII (e.g., student academic records, health information, personnel files) into any Public AI Tool.
1. Users shall seek approval from the University's designated authority responsible for data protection before processing highly sensitive data using Enterprise AI Tools, before processing highly sensitive data using Enterprise AI Tools.
- II. Users shall anonymize or de-identify all personal data before utilizing it in any AI system, unless explicit consent has been obtained and documented.

Section (B): Vendor Management and Intellectual Property

5.5 Vendor Compliance:

2. The IT Department shall review security and privacy considerations before approving or implementing Enterprise AI Tools..

3. Where applicable, vendors should provide assurances regarding the protection and appropriate use of Gulf University data.

5.6 Intellectual Property Protection

- I. Researchers and faculty shall not input unpublished research data, patentable inventions, or proprietary institutional knowledge into Public AI Tools.
- II. The University shall retain full ownership of all institutional data processed by Enterprise AI Tools

Section (C): Compliance and Accountability

5.7 Accuracy and Accountability

- I. Users remain responsible for verifying the accuracy, completeness, and appropriateness of AI-generated outputs before official use.
- II. Users shall not use misleading AI-generated content or manipulated media without appropriate authorization and verification..

5.8 Data Retention

- I. Users shall acknowledge that data retention laws apply to AI-generated content, including meeting transcripts and generated documents.
- II. The University may review, retain, or remove AI-generated institutional content in accordance with applicable regulations and university policies.

5.9 Violations:

- I. Violations of this policy may result in administrative or disciplinary actions in accordance with applicable university regulations and policies.
- II. The University shall report severe data breaches involving PII to the relevant national authorities as required by the PDPL.

6. Responsibilities

Academic and Administrative Staff are responsible for:

- Following this document appropriately

University Council is responsible for:

- Review and recommend this policy for BOT approval.

Vice President for Academic Affairs is responsible for:

- Appropriate implementation of this document.

Head of Information Technology is responsible for:

- Appropriate implementation of this document.

Deans and Heads of Departments is responsible for:

- Appropriate implementation of this document.

7. Related Policies

- IT Policy
- AI Governance and Oversight Policy
- Information Technology Policy

8. Related Procedures

- Information Security Procedures
- AI Governance and Oversight Procedures

9. Related References and Standards

BQA	Institutional Review Handbook
HEC	Academic regulations and Principles