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APRIL 2025

# **DIGITAL, DATA, CYBER & DATA PRIVACY NEWSLETTER**

# Dear colleagues,

Welcome to the 19th edition of the Digital, Data, Cyber & Data Privacy Newsletter, featuring a brand-new format and design!

A key theme of this edition is Simplification - bringing a more simple, streamlined and efficient approach. We hope you will find the updates useful.

To find out more, please visit our [Digital, Data, Cyber & Data Privacy portal](#) or [Viva Engage](#). If you have any questions or feedback, do not hesitate to reach out to us at [privacy@abb.com](mailto:privacy@abb.com)

If you're not currently receiving the Newsletter but would like to subscribe, click [here](#).

Wishing you an enjoyable read!



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# New Privacy Notice for Externals

by Weronika Stysinska

We are pleased to announce the release of our new **Privacy Notice for externals**, replacing the former privacy notices for Content Production and Publishing, Customers, Digital Channels, Event Management, External Public, Suppliers, Talent Acquisition, Visitor & CCTV; **a huge simplification.**

Here are the key points:

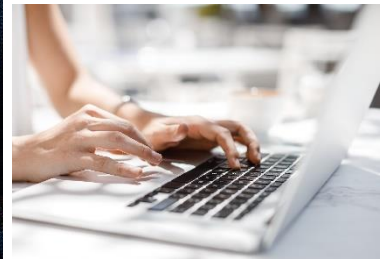
**New Privacy Notice Link:** [ABB Privacy Notice](#)

**No Action Required:** Business Process Owners do not need to make any changes to existing processes. All previous privacy notices have been just redirected to this new link.

**For new processes,** please refer to the following link: [ABB Privacy Notice](#)

**Employee and Contractor Notices:** The privacy notices for employees and contractors remain unchanged and in use.

This update simplifies our privacy notice management and ensures consistency across all external communications.



**Compliance Tip:** Privacy notice should be available at the time of data collection to ensure transparency. Make sure this link is easily accessible within your documentation, application, or platform. Ideal placements include:

- Website footer – a common spot for compliance-related links
- User account settings – where individuals can review key information
- Contact, request, and consent forms – ensuring visibility at important interaction points
- Terms & agreements – embedded within contractual documents
- Email footers – included in initial external communications for clarity



# Data Privacy Contracting update

by Michal Rokicki



Another simplification and improvement.

We are pleased to share a significant improvement in our data privacy contracting process: the Privacy Management Team has deployed an overhauled version of **ABB's Data Processing Agreement** template to enhance usability, better safeguard ABB's interests and align it with the branding standards.

The key improvements include:

📄 **simplified structure** – we made the template easier to use, while maintaining a high level of compliance;

🔒 **better safeguards** – by revisiting and then making sure there are no ambiguities within the template clauses that previously led to prolonged negotiations;

✂️ **enhanced design** – refining the document's look by including ABB branding and uniformed text formatting, giving the DPA a more professional look;

🔍 **increased transparency** – in a dedicated section of the Data Privacy Portal we have described the key steps of the contracting process and applicability to ensure smoother execution.

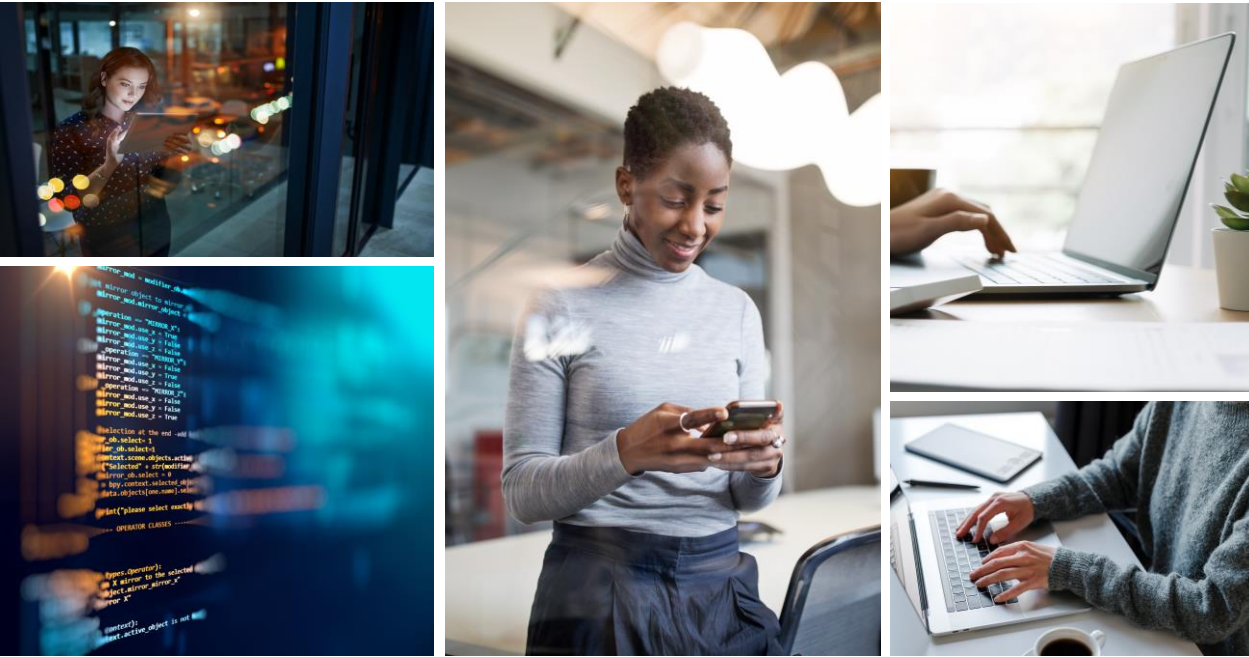
## ➔ What's next?

To make the most of these updates:

1. Visit our [Data Privacy Portal – Data Privacy Contracting](#) for detailed guidance and resources on the process.
2. Explore the updated contract template [here](#).

📩 Got questions? We're always happy to help – reach out anytime at [privacy@abb.com](mailto:privacy@abb.com)

# 02



# So, you are thinking about developing an AI chatbot?

Here are three things to think about to help you.

by Urszula Krokay

## 1. What is your intended use case?

Critically think about what problem you are trying to solve (and why AI chatbot will be a better solution than other available options).

Once you determine AI chatbot is your best option, define what is the outcome you are trying to achieve.

## 2. Which type of AI will fit my use case?

On a high level, there are different AI models that will be suitable for different use cases. The two main types of models are:

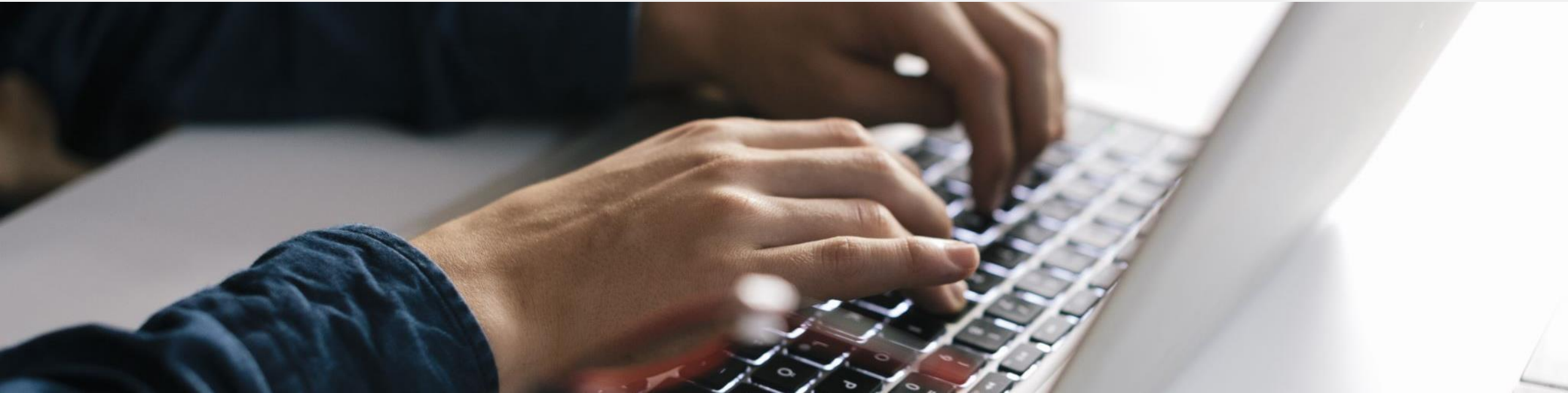
**Deterministic** – traditional machine learning model where the same input will always produce the same output. They rely on clear, rule-based learning.

**Probabilistic** - they don't follow hard-coded rules but instead generate text based on statistical likelihoods. All LLMs operate entirely probabilistically.

Below table show chatbots use cases that are better for each type of model.

| <i><b>Deterministic</b></i>                                                                                                                    | <i><b>Probabilistic</b></i>                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Rule-based, deterministic models are better when responses must be <b>precise, consistent, and predictable</b> (i.e., no room for randomness). | When responses require <b>flexibility, natural language generation, and adaptation to open-ended inputs</b> . |
| A bot providing tax filing guidance based on laws (since the response must be fixed, with no probabilistic variation).                         | Customer support chatbot on an e-commerce site that can handle open-ended queries.                            |
| Banking chatbot providing account balance (must return exact value).                                                                           | Creative writing or marketing content generation (since there is no one correct answer).                      |





ChatGPT generates realistic sentences by learning from a large dataset of real sentences. It can provide accurate driving directions based on guidebooks used as training data. However, it may give incorrect answers to slightly different questions, as its responses rely on learned linguistic patterns.

### **3. What are the potential issues the AI chatbot might cause?**

We need to think like bad actors to come up with the solutions that will stop the things bad actors may do. Large Language Models (LLMs)

are designed to help people, but sometimes they can be tricked into providing services for free (via a technique called prompt injection attack). For instance, searching "Google Chevy Tahoe for \$1" shows how things can go wrong. Plus, LLMs might produce hallucinations, leading users astray.

This is why it is critical to brainstorm all possible adverse scenarios and build in controls to mitigate them.

One of the controls will always be providing user with the clear instruction that they are interacting with AI, how they should use it (intended use case), and what to watch out for (e.g. likelihood of hallucinations).



**Thank you for reading, and don't forget to log your AI use case in [ABB's AI Repository & Legal Review Portal - Power Apps!](#)**

03

# Records of Processing - what not to register?

by Michele Majkut

We're excited to share an update that keeps creating **Records of Processing (RoP)** in the **Privacy Management System** efficient and simple for everyone. This update reflects our commitment to keep data privacy operations easy to manage while upholding data protection standards.

## ✔ Simple approach

Basic personal data such as first name, last name, business email address, or account details with limited purposes do not need to be registered as separate RoP in the system because they are not a personal data processing activity. Individual systems or applications are also not personal data processing activities and therefore do not need to be registered as a separate RoP either.

## 🤝 Providing Support

We will continue to handle personal data in accordance with applicable laws, including the obligation to create RoPs of real personal data processing activities. If you have doubts whether your business process should be registered as a RoP, as a separate RoP or part of a bigger RoP, please reach out to [privacy@abb.com](mailto:privacy@abb.com). Our team is here to collaborate with you and provide tailored support. If you have any questions or need further assistance, don't hesitate to reach out!

04

# Regulatory Highlights: Recent Must-Know Updates

by Michele Majkut



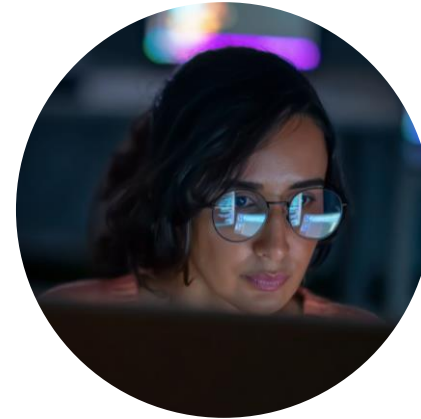
## CNIL Issues Guidance on Multi-Factor Authentication to Strengthen Data Security

The French Data Protection Authority (CNIL) has released recommendations on multi-factor authentication (MFA) to enhance cybersecurity and ensure compliance with GDPR. These guidelines provide practical advice on implementing MFA while respecting data protection principles, such as data minimization and legal basis requirements. Learn more [here](#).



## New Swiss Cookie Consent Guidelines Introduced

The Swiss Federal Data Protection and Information Commissioner (FDPIC) issued updated cookie consent guidelines. These guidelines emphasize explicit consent for non-functional cookies and prohibit misleading practices like dark patterns. You can explore these guidelines [here](#).



## GDPR Fines in Early 2025

- Vodafone Spain (€8.15M): Fined for commercial communication failures, including unlawful marketing practice. Learn more [here](#).
- Generali España (€4M): Fined after a data breach affected 1.6 million individuals due to insufficient safeguards. Learn more [here](#).
- Sambla Group Oy (€950K): Penalized for inadequate security measures exposing sensitive data. Full details are available [here](#).



### Compliance Tip:

Visit the [Data Privacy Portal](#) to find useful guidance and trainings about personal data protection, including appropriate technical and organization security measures.

If you need support, reach out to us at [privacy@abb.com](mailto:privacy@abb.com).

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# Thank you for taking the time to explore this edition!

We hope it brought you fresh perspectives and valuable insights. Stay tuned for more in our upcoming issues. Your feedback matters - don't hesitate to share your thoughts with us!

In case you missed it: check the [previous editions](#) of our Digital, Data, Cyber & Data Privacy Newsletter.

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