

# Partners Serbia

## CODE OF ETHICS FOR AI-ASSISTED OPERATIONS

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|-------------|-----------------------|----------------|--------------------|
| Version     | 1.0 — Initial Release | Effective Date | 1 June 2026        |
| Next Review | [Date + 1 year]       | Approved By    | Executive Director |

### Preamble

Partners Serbia is a Belgrade-based civil society organisation devoted to upholding the rule of law, supporting civil society and institutional development in Serbia and the Western Balkans, and building local capacity through a reliance on local expertise. Our work spans freedom of expression, personal data protection, anti-corruption, prevention of unlawful biometric surveillance, access to information, and the integration of the European Union.

As an organisation that actively advocates for the rights of citizens in the digital environment — combating illegal surveillance, defending privacy, and championing freedom of expression online — we are acutely aware of the risks that AI tools can pose when used irresponsibly. This Code of Ethics reflects our conviction that those who fight for digital rights must lead by example in how they use digital tools.

This Code governs the use of artificial intelligence tools — including large language models, automated analysis systems, and AI-assisted research tools — across all of Partners Serbia's programmes.

This Code applies to all staff, interns, volunteers, consultants, and partner organisations acting on Partners Serbia's behalf in any activity related to our mission.

***AI use disclaimer: Drafting of this document was assisted by the AI tool – ClaudeAI. Inputs for the documents, as well as the review and final edits were provided by Partners Serbia staff. The final version was reviewed by the Compliance Officer and Executive Director.***

## Core Ethical Principles

Partners Serbia's use of AI tools is governed by the following eight principles, rooted in our organisational values and the international human rights framework we uphold:

**01**

PRINCIPLE

### Human Rights Primacy

AI tools shall never be used in ways that undermine the rights we exist to defend - including the right to privacy, freedom of expression, non-discrimination, due process, and access to information. AI will also not be used to make decisions on individual rights and freedoms.

**02**

PRINCIPLE

### Transparency

We will be open with all stakeholders — citizens, communities we serve, donors, and the public — about when and how AI tools contribute to our work, research, publications, and advocacy.

**03**

PRINCIPLE

### Accountability

AI-generated outputs remain the full responsibility of the Partners Serbia and its staff member who used them. Human review, editorial judgment, and approval are mandatory before any AI-assisted content is used externally. No accountability can be delegated to a machine.

**04**

PRINCIPLE

### Data Minimisation, Privacy & Confidentiality

Given our work with whistleblowers, journalists, activists, and individuals involved in surveillance-related cases, no personal or case-sensitive data shall be entered into AI tools without explicit justification, legal basis, and appropriate safeguards.

**05**

PRINCIPLE

### Non-Discrimination

We will actively monitor AI outputs for bias, especially in outputs relating to marginalised and minority groups we serve. AI tools shall not be used in ways that discriminate on any protected ground.

**06**

PRINCIPLE

### Integrity & Accuracy

AI-generated content - including legal analysis, policy commentary, and advocacy materials - must be independently verified by a qualified team member. Partners Serbia will never misrepresent AI-assisted work as purely human-authored.

**07**

PRINCIPLE

### Minimal Footprint

AI tools shall be used only where there is a clear, legitimate purpose. Usage must be proportionate, avoiding unnecessary data processing. This is especially critical given our work on surveillance: we do not use tools that surveil, track, or profile individuals.

**08**

## PRINCIPLE

**Continuous Improvement**

We commit to regular review of this Code in response to new evidence, stakeholder feedback, evolving best practices, and developments in EU and Serbian law — including the EU AI Act and Serbian data protection legislation.

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**Permitted Uses of AI Tools**

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The following uses are explicitly permitted across Partners Serbia's programmes, subject to the safeguards in this Code:

- Research and analysis — summarising publicly available legal texts, policy documents, regulatory frameworks, and academic literature; identifying trends in public datasets relevant to digital rights monitoring, subject to mandatory human review and editing by responsible staff.
- Drafting and editing — producing initial drafts of reports, policy briefs, grant applications, newsletters, and advocacy materials, subject to mandatory human review and editing by responsible staff.
- Translation and accessibility — assisting with translation of materials between Serbian, English, and other regional languages, always with review by a qualified human translator, especially for legal or advocacy content.
- Legal research support — assisting in identifying relevant case law, legislation, and regulatory developments in Serbia, the EU, and internationally; all legal conclusions must be verified by Partners Serbia legal staff.
- Design and visuals— assisting with design, layouts and visuals for websites, social networks and other outreach materials.
- Training and capacity building — developing educational content, scenario simulations, and self-learning materials for staff, partner CSOs, and citizens on digital rights and data protection topics.
- Administrative and financial management tasks — scheduling, internal meeting summaries, and internal communications, drafting and reviewing budgets and spending, where no sensitive personal or case data is involved.

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**Prohibited Uses of AI Tools**

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In view of the sensitive nature of Partners Serbia's work with at-risk communities and individuals, the following uses are prohibited:

- Processing personal data relating to individuals without explicit consent, a documented legal basis, and the appropriate level of anonymisation.
- Entering into AI systems personal data of whistleblowers, sources, victims of surveillance, or individuals who have reported abuse of rights through Partners Serbia's or partnering organizations' channels.
- Using AI tools to generate or amplify disinformation, manipulative advocacy content, or materials that misrepresent legal positions or factual situations.

- Profiling or risk-scoring individuals – including, but not limited to, public officials, persons under investigation, or individuals involved in Partners Serbia cases — using AI-generated inference or pattern recognition.
- Automating legal advice, individual rights assessments, or any decision that affects the rights of citizens without mandatory expert human review.
- Publishing AI-assisted legal analysis, litigation strategy, or advocacy positions externally without verification and sign-off by qualified legal staff.
- Using AI tools to monitor, surveil, or track individuals in any context — consistent with our principled opposition to unlawful surveillance documented in projects such as Preventing Unlawful Biometric Surveillance and Surveillance and Censorship in the Western Balkans.
- Using AI outputs externally — in publications, press releases, comments on draft legislation, or court submissions — without adequate human verification and editorial approval.

## Disclosure and Transparency Obligations

### External Disclosures

When AI tools contribute materially to any external output — including publications, policy comments, advocacy reports, litigation materials, or public communications — Partners Serbia will include a clear disclosure. This reflects our commitment to the same transparency standards we demand from public institutions and the private sector. The disclosure shall specify the nature of the AI contribution and confirm the extent of human review.

*Suggested standard disclosure text:*

*"This document was produced with the assistance of AI tools. All content has been reviewed, edited, and approved by the responsible Partners Serbia team. Partners Serbia takes full responsibility for the accuracy, legal correctness, and integrity of this document."*

### Internal Transparency

Partners Serbia will maintain a centralised AI Usage Register recording the tool used, the purpose, the responsible staff member, and any associated risks or incidents.

Given that Partners Serbia regularly comments on draft legislation and files formal regulatory inputs any AI-assisted contribution to such submissions must be reviewed and approved by the Executive Director or designated legal lead prior to submission.

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## Data Protection and Privacy Safeguards

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Partners Serbia is a recognised expert organization in personal data protection under Serbian law and the GDPR, providing advisory services to citizens and organisations. Our AI use must be consistent with the standards we advocate for externally.

Partners Serbia recognises that, in the course of its regular operations, it uses third-party digital services provided by companies that may process certain data as independent controllers, under their own terms, policies and technical infrastructure. While Partners Serbia cannot determine or control such providers' independent processing activities, it selects and uses such services with due care, guided by the principles of necessity, proportionality, accountability, security, and respect for privacy and other fundamental rights.

- **Applicable Law:** All AI tool use must comply with the Serbian Law on Personal Data Protection (2018), the GDPR and EU AI Act where applicable, and any sectoral data protection rules relevant to our specific programmes.
- **Special Categories of Data and Confidential Information:** Special categories of personal data will not be entered into any third-party AI tool as a rule. Any exception must be strictly limited to situations where the processing is expressly permitted under applicable data protection law, necessary for a clearly defined and legitimate purpose, proportionate to that purpose, and subject to prior documented assessment. The same restrictive approach applies to personal data of litigants, clients, case subjects, as well as to confidential communications protected by legal privilege, data from security sector monitoring or surveillance documentation, and information received under confidentiality obligations from partner organisations or donors. Such data may be processed through AI tools only where no less intrusive alternative is available, where the highest practicable level of anonymisation or pseudonymisation has been applied, and where appropriate contractual, technical and organisational safeguards are in place.
- **Anonymisation Standard:** Where AI-assisted analysis of real cases or data is genuinely necessary, staff must anonymise or pseudonymise data to the highest practicable standard before processing, in consultation with the Data Protection Officer where appropriate.
- **Tool Assessment:** Before adopting any new AI tool, the Compliance Officer, supported by program staff, shall conduct a Data Protection Impact Assessment (DPIA) and review the provider's data retention, processing, and security policies. Given Partners Serbia's role as a data protection advisor, this assessment shall be documented to the same standard we would recommend to external clients.
- **No Training Contribution:** Where technically possible, Partners Serbia shall configure all AI tools to opt out of contributing organisational data to provider training datasets. This must be the default configuration for all organisational accounts.

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## Accountability Framework

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### Individual Responsibility

Every staff member who uses AI tools is personally accountable for the quality, accuracy, and rights-compliance of the outputs generated under their account. Accountability cannot be delegated to the AI system, nor to a colleague who did not review the work.

## Organisational Oversight

| Role                                               | AI Governance Responsibilities                                                                                                                                                                                             |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Executive Director</b>                          | Final accountability for AI ethics compliance across all programmes; approves AI-assisted contributions to formal regulatory submissions, litigation materials, and major advocacy outputs; approves changes to this Code. |
| <b>Compliance Officer</b>                          | Reviews and signs off on all AI-assisted legal analysis, litigation strategy documents, comments on draft legislation, and court submissions before external use.                                                          |
| <b>DPO</b>                                         | Maintains the AI Usage Register; conducts tool assessments and assists in performance of DPIAs; manages incident response; advises staff on data protection obligations in AI use.                                         |
| <b>Programme Officers and Project Coordinators</b> | Ensure AI use within their programmes complies with this Code; conduct first-level review of AI-assisted outputs.                                                                                                          |
| <b>All Staff &amp; Interns</b>                     | Complete mandatory AI ethics training before using any AI tool for Partners Serbia work; document AI usage in project logs; report concerns and incidents to DPO.                                                          |

## Incident Reporting and Response

Any staff member who becomes aware of a breach or suspected breach of this Code — including unintended disclosure of case-sensitive or personal data to an AI system, generation of content that violates the rights of individuals, or undisclosed AI use in externally published materials — must report the incident immediately to the DPO and their line manager.

All incidents will be logged, investigated, and remediated in line with Partners Serbia's broader Incident Response and Data Breach Policy. Where an incident involves personal data, Partners Serbia will notify affected individuals and the Serbian Commissioner for Information of Public Importance and Personal Data Protection within legally required timeframes, in accordance with the Law on Personal Data Protection.

Partners Serbia will apply to itself the same standard of transparency and accountability in incident disclosure that it demands from public institutions and technology companies in its advocacy work.

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## Stakeholder Engagement and Public Accountability

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As an organisation that holds others accountable for their use of technology, Partners Serbia commits to the following public accountability measures:

- **Annual AI Transparency Report:** Partners Serbia will publish an annual account of its AI tool usage, including tools used, categories of use, risks encountered, incidents recorded, and remedial steps taken. This will be integrated into our Annual report, consistent with our existing public accountability commitments.
- **Community Feedback Channel:** Citizens, communities, partner CSOs, and other stakeholders may submit feedback or concerns about Partners Serbia's AI use at any time via [office@partners-serbia.org](mailto:office@partners-serbia.org).
- **Network Accountability:** As a member of the SEE Digital Rights Network and the Global Network Initiative (GNI), Partners Serbia will share relevant learnings and best practices on responsible AI use within these networks, contributing to regional civil society capacity.
- **Executive Director, Compliance Officer and DPO** perform a yearly update on AI governance.
- **Prior Consultation for Sensitive Programmes:** Before deploying AI tools in programmes involving at-risk individuals — including legal aid, surveillance documentation, or anti-SLAPP work — Partners Serbia will assess the specific risks and consult with the affected communities where appropriate.

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## Training and Capacity Building

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Responsible AI use requires knowledge and ongoing learning. All Partners Serbia staff and interns will complete the training with the content which will include:

- the technical limitations and known failure modes of AI systems, including hallucination, bias, and confidentiality risks;
- the requirements of this Code and each staff member's individual obligations;
- the specific risks posed by AI tools in the context of digital rights, privacy, and anti-surveillance work;
- how to identify and report AI-related risks and incidents;
- data protection obligations under Serbian law and the GDPR when using third-party AI tools.

Training materials shall be updated annually, or following significant changes to this Code, relevant legislation, or the AI tools in use. Partners Serbia may also develop and share AI ethics training resources for partner CSOs in Serbia and the wider region, consistent with our capacity-building mission.

In addition, this Code is shared and presented to external consultants and associates, while their obligations related to ethical use of AI will be determined via contractual clauses.

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## Review and Amendment

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This Code shall be reviewed annually by the Data Protection Officer, Compliance Officer and Executive Director, with input from staff, and where appropriate, external stakeholders including beneficiary communities. A complete version history will be maintained and made available to any stakeholder upon request.

Partners Serbia recognises that the legal and technological landscape governing AI is evolving rapidly. We commit to updating this Code without waiting for the annual review cycle when regulatory or operational developments require it.

This Code, and any amendments to it, will be published on the Partners Serbia website at [www.partners-serbia.org](http://www.partners-serbia.org) as part of our Transparency and Accountability commitments.