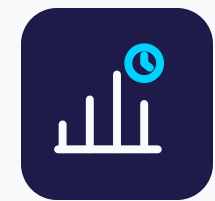


The Managing Broker's AI Governance Checklist



Governance & Strategic Foundations

- 1 Designate an AI Compliance Owner**
Name one person for oversight, tool approval and compliance questions.
- 2 Adopt an Acceptable Use Policy (AUP)**
Define approved tools, prohibited data and human-review requirements.
- 3 Inventory Every AI Tool**
List each app, vendor and embedded AI feature across the brokerage.
- 4 Use a Risk-Tiering Framework**
Sort AI uses from low to high risk to set the level of review.
- 5 Document Every Go/No-Go Decision**
Keep an auditable record of tools approved or denied, and why.
- 6 Review the Policy at Least Annually**
Update it whenever tools, vendor terms or rules change.



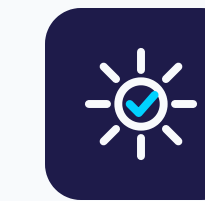
Data Privacy & Security Guardrails

- 7 Define Data Classification Tiers**
Set rules for public, internal, confidential and restricted data.
- 8 Keep Client PID Out of Consumer AI**
No SSNs, bank details, client names, addresses or unreleased deal terms in free public tools.
- 9 Review Vendor Data Agreements**
Get signed DPAs and find out whether the vendor trains on your data.
- 10 Verify Retention and Data Location**
Confirm how long vendors keep data and where it is stored.
- 11 Decide When Consent or Disclosure Applies**
Have counsel draft any AI language. Do not edit standard forms yourself.
- 12 Add Technical Privacy Controls**
Where possible, block unapproved apps and redact sensitive data before it reaches a model.



Fair Housing & Marketing Compliance

- 13 No Automated Accept/Deny Decisions**
A person makes the final call. You cannot hand Fair Housing responsibility to an algorithm.
- 14 Audit Descriptions for Steering**
Check AI copy for coded language before it is published.
- 15 Review Ad Targeting for Bias**
Avoid geographic exclusions and demographic proxies in AI-driven ads.
- 16 Disclose Staged or Altered Images**
Follow your MLS rules. Canopy: label on the image and show the original before or after.
- 17 Label AI Avatars and Video**
Recommended: disclose synthetic presenters. Check MLS and state rules.
- 18 Verify Every Property Fact**
Check AI-drafted details against MLS data and authoritative records.



Operational Oversight & Training

- 19 Require AI Ethics & Fair Housing Training**
Train agents before they use approved AI tools.
- 20 Enforce Human-in-the-Loop Review**
AI output is a draft. A person checks and approves it before release.
- 21 Fact-Check AI Market Statistics**
Verify reports against MLS or county records.
- 22 Set an Incident Response Path**
Stop, notify the broker, preserve evidence, assess with counsel.
- 23 Keep AI Out of Legal Drafting**
No AI-drafted contract language or legal advice. Use approved forms and attorneys.
- 24 Audit AI Usage Regularly**
Compare agent usage with the policy on a set schedule.
- 25 Keep Training Records**
Track completion for an audit trail.