

# Managing the GenAl Revolution at OP Pohjola

Dr Juha Vesanto, Al tribe lead, CAIO, OP Pohjola The Impact of AI on Economy, Finance and Supervision November 5<sup>th</sup>, 2025

# Topics

The road behind Trials, early successes and lessons learned

Current challenges
Choosing our path, and how to make the journey

Managing the ride What does regulation give us?





# The road behind

Trials, early successes and lessons learned



# Our Al journey

### 1980's: First expert systems

### 2017 – 2018: Finanssiäly -program

- First "data sciencists" hired, working in over 70 projects (some of which are still in use)
- Introductory workshops on data science / artificial intelligence
- Ethical principles of Al

### 2019 – 2020: Al development growth

- Data Scientists working in ~30 development teams
- "Introduction to Artificial Intelligence" –course in internal learning portal
- Several new lauches, eg Personal Finance Management in OP Mobile

### 2021 – 2022: Data and analytics expansion

- Citizen Data Science –program
- Databricks tool, data science community

### 2023: Data productization, GenAl

- · Launch of OP Data Platform for data productization
- Maiju ChatGPT for OP internal use

### 2024: Al governance, GenAl experimentation

- Experimentation on GenAl
- Al Act, Al governance, Responsible use of Al

#### 2025: Al framework

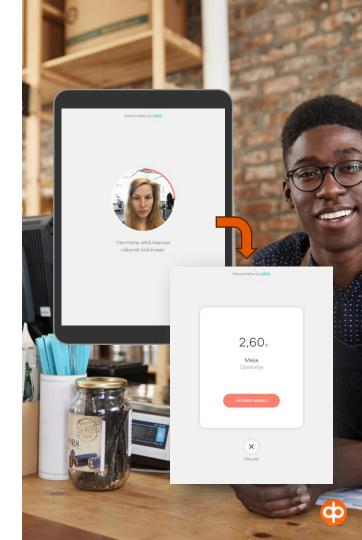
- Value capture based Al roadmap
- Al tribe, Al Ambassadors



## Kasvomaksu by Pivo

Using biometric authentication and facial recognition techniques to enable cardless payments

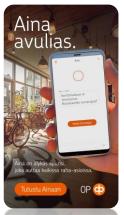
- > An early pilot on using face as a way to authenticate and pay
  - > Pre-registration
  - > Select payment method
  - > Wait for face recognition
  - Accept payment
- > Was in pilot use internally during 2019-2020
- > Discontinued due to GDPR related privacy concerns



## OP Aina

Early-mover in taking Chatbots into use in providing financial services







- Chatbot launched in 2019
  - > Dialog engine, based on Watson and BERT 1st gen
  - > Tuned by "Al Whisperers"
- > Fast answers to customer questions
  - > Answers over 12 000 questions (2024)
- > 2<sup>nd</sup> phase: Digital assistant
  - > Ability to *do* things for the customer
  - > 100+ different use cases (2024)



Opotti - 10.34

Tarkista omista korteista, että kortin turvarajat ovat riittävän suuret. Huomioi myös vuorokauden muut ostot ja nostot.

Ovatko turvarajat riittävät?

Kyllä, turvarajat ovat riittävät

Ei, turvarajat ovat liian pienet

Korttisi 4901 65\*\* \*\*\*\* 2715 turvaraja maksuille verkossa ja sovelluksissa on 50 €/vrk.

Jotta maksusi onnistuu, suosittelen nostamaan turvarajan 500 euroon.

Valitse uusi turvaraja.

| 500       | > |
|-----------|---|
| Muu summa | > |
| Peruuta   | > |



## Al Act timeline vs OP Pohjola activities

- > 3 / 2018 OP publishes ethical principles on using Al
- > 5 / 2018 GDPR comes into effect
- > 2020-2022 AIGA project in Turku University
- > 4 / 2021 Initial proposal on AI Act
- > 1 / 2023 First AI transparency report from OP

- > 2 / 2024 Regulatory change program wrt Al Act started at OP
- > 3 / 2024 Al Act approved in EU parliament
- > 4 / 2024 Responsible Al policy renewal at OP
- 8 / 2024 Al Act comes into effect.
- > 9 / 2024 Initial version of AI inventory in place at OP

Al Act enters into force and transition period starts (August 2024) 12 months transition period for GPAl-models' requirements (August 2025) 36 months transition period for use cases under EU harmonized product safety regulations (Annex II) (August 2027)











6 months transition period for prohibited use cases (February 2025) 24 months transition period for high-risk AI systems (Annex III) and transparency requirements for limited risk systems (August 2026)



### Lessons learned

Data protection is a key issue that needs consideration right from the beginning

Moving early is costly – having to redo and redesign – but also gives early mover advantage

The most successful solutions remain adaptive and rebuild their vision continuously

While "citizen" development brings scalability, your should aim for simplicity, clarity and enforced common frameworks

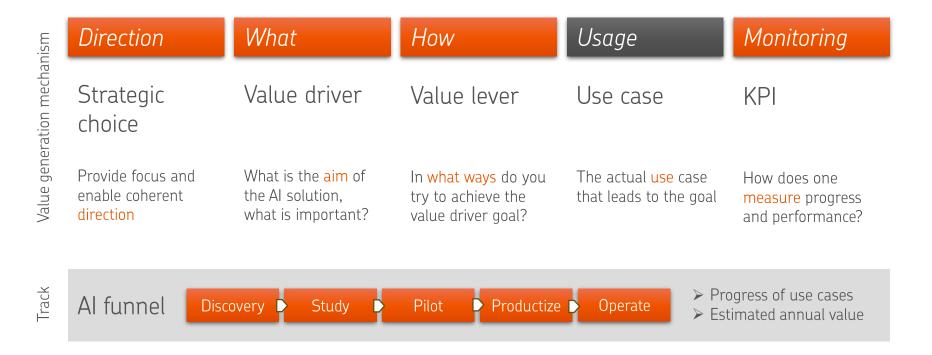


# Current challenges

Choosing our path, and how to make the journey



## Issue #1: How does Al create value?





# Issue #2: Regulation & governance

# OP Pohjola is a pioneer in the responsible use of artificial intelligence

Responsible Al policy: publication 2018, update 2024

Participation in the Al Governance and Auditing programme of the University of Turku (2020–22)

Participation in national cooperation on responsible artificial intelligence, e.g. Al Finland (2024-)

# Implementation of the Artificial Intelligence Regulation at OP Pohjola

The regulatory change project was launched in January 2024

Your own interpretation of the regulation and its implementation, including data protection, risk management, compliance and Al experts

### Currently ongoing

- Governance model for Al
- Guidance for high-risk Al systems
- Sustainability goals for Al

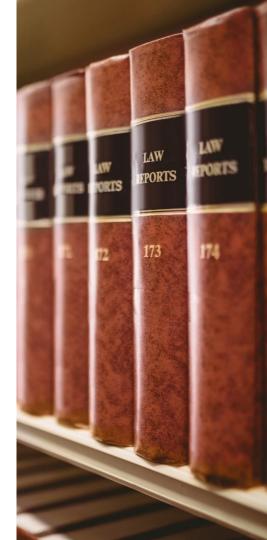
Regulatory change project 15.1.2024

Al Act into force 
2.8.2024

Prohibited use cases 2 2 2025

GPAI requirements 2.8.2025

High risk use cases 2.8.2026 Fully in force 2.8.2027



# Issue #3: Explosion of usage

### Technology

- Deluge of new models, new features, new functions
- Soon all tools will have "Al inside"

### **Users**

- Over 2/3 of OP Pohjola personnel are using AI on regular basis
- > Monitoring usage?

### Use cases

- Overwhelming number of use cases (to be reviewed)
- Assess everything, or instruct?

### Agents

- > From automation to autonomous agents
- > Human-overthe-loop?





Managing the ride
What does regulation give us?



## Governance model for Al

| Governance Oversight, policies, reviews | Support & services Apps & help | Community & skills Culture, peers & knowledge | Tools & WoW<br>Tooling, processes |
|---|--------------------------------|---|-----------------------------------|
| Risk, compliance & regulation           | Validation, cyber security     | Comms & community                             | Tools (licenses + support)        |
| Roadmap & strategy                      | Service apps                   | Education                                     | Technology components             |
| Costs & value                           | Support channels               | Competence management                         | Patterns & blueprints             |
| Architecture & tech stack               | Production services            | Partners                                      | Dev & Ops practices               |
| $\bigcirc$                              | $\overline{\Box}$              | $\Box$  | $\Box$                            |



## Regulation – what did we learn from GDPR?



### The bad

- More management
- > More processes
- More training
- More documentation
- > More bureaucracy

### The good

It forces us to follow many analytics best practices

- > use case driven
- emphasis on monitoring quality of data
- > cybersecurity practices

### The ugly

- Lack of legal practice
- Unclear interpretation of legal text
- > The danger is overconservative interpretation

Key to scalability: federated authority to avoid bottlenecks, creation of 'round tables' for escalation





# What I like about the Al Act? High risk use case requirements

Al Act enforces high-risk Al systems to follow the best practices of product management

- Careful documentation of data
- Careful testing practices
- Emphasis on Al model robustness
- > Minimization of health and safety risks



# Summary



Being a conservative company working in a conservative sector does not mean you cannot be an early mover



Controlling the change needs new methods and ways of working – but the fundaments are the same



Regulation has good things to offer – when we are aligned and listen carefully & thoughtfully



