

Example

Amazon hiring tool (2018)

Clearview AI (2022–2024)

Dutch toeslagenaffaire (2005–2019)

COMPAS recidivism (2016)

Apple card (2019–2024)

ISO 42001 early adopters (2025)

What happened

AI trained on 10 years of male-dominated resumes penalized women applicants. Project was scrapped.

Scraped billions of facial images without consent. Fined \$30.5M (Netherlands), \$20M each (France, Italy, Greece).

Fraud detection algorithm used nationality as a risk factor. Approximately 26,000 families were wrongly flagged. The government resigned in January 2021.

ProPublica’s investigation found Black defendants were incorrectly labeled high-risk at twice the rate of white defendants.

Goldman Sachs’ algorithm offered women significantly lower credit limits than men with comparable credit profiles. New York DFS investigation led to \$25M in restitution and penalties.

KPMG, Microsoft, and others achieved certification for AI management systems, establishing third-party validated governance frameworks.



Compliance lesson

Biased training data produces biased outcomes regardless of algorithmic sophistication.

Biometric data processing without a lawful basis triggers enforcement across multiple jurisdictions simultaneously.

Institutional bias encoded into training data creates discriminatory systems. Black-box algorithms without human oversight compound the harm.

Even well-calibrated algorithms can perpetuate systemic disparities. Fairness requires more than accuracy metrics.

Disparate outcomes in consumer lending trigger regulatory scrutiny even without explicit discriminatory logic.

Structured governance frameworks provide a competitive advantage in procurement and build stakeholder trust.