



Using AI in Investment Firms:

Practical Guidance on Staying Compliant

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02.12.2026

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I'm a strategic IT advisor at Xantrion, where I assist regulated clients improve operational efficiency through practical, secure technology adoption.

My work focuses on translating emerging tools - especially AI - into real, defensible workflows that align with how smaller firms actually operate. I specialize in helping RIAs introduce AI in ways that improve staff capacity while remaining exam-aware, supervised, and grounded in day-to-day reality.

Everyone is Using AI (And You Know It)

- AI embedded in drafting, research, operations, communications
- Staff adoption happening with or without approval
- Refusal to engage is not a control strategy

The Real Risk: Unsecured and Unsupervised AI

- Personal accounts used for firm work
- No books & records posture
- No supervisory review
- No vendor diligence
- No data governance

How Regulators Are Evaluating AI Use

- Who approved the tool and why?
- What data is permitted?
- How is output supervised?
- Is usage documented and reviewed?

Compliance Pillars

Engage — acknowledge and approve usage

Secure — control access, data, and identity

Supervise — define use cases and review outputs

Document — approvals, training, and oversight

Choosing the Right AI Tools

- Use-case driven selection
- Tech stack and identity integration
- Training-on-your-data posture
- Supervision and recordkeeping fit
- Data access model (ambient vs. file-based)

Securing AI Platforms: Baseline Expectations

- Enterprise accounts with SSO and MFA
- Central administration and logging
- Data classification rules
- Defined retention and recordkeeping stance

Using AI Safely and Responsibly

- AI output is a draft, not authority
- Human review for client-facing content
- Risk-tiered use cases
- Training to prevent over-reliance

A Defensible AI Roadmap

30 days: assign an owner, inventory tools, approve **one** tool, publish policy

60 days: pilot low-risk workflows, train users

90 days: expand use cases, reassess risk

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