

AI PLAYBOOK 17

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# The Marketing AI Risk Assessment Matrix

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Content partially generated by artificial intelligence, refined by human expertise.

This Playbook is part of the CMA's AI Mastery Series, empowering marketers to Implement AI in ways that earn regulatory confidence, maintain strong brand reputation, and foster consumer trust

# The AI adoption imperative

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Canadian marketing teams face an unprecedented challenge: adopting AI technologies fast enough to remain competitive while managing complex risks that can impact brands overnight. The question isn't whether to adopt AI, but how to do it safely and compliantly.

Beyond financial penalties, brand safety incidents from AI-generated content can damage customer trust and require sustained recovery efforts spanning multiple quarters. Operational failures in AI systems during critical campaigns are substantially more expensive to remediate than prevent, while compliance violations can trigger costly regulatory investigations that consume executive time and resources.

Proactive systematic AI risk management enables organizations to confidently pursue AI's competitive advantages while protecting against potential risks.

# The 3×3 matrix framework

To enable confident AI adoption and faster scaling of successful applications, the Marketing AI Risk Assessment Matrix provides a systematic approach to evaluating AI risks across three critical dimensions, assessed across three severity levels using either a simple 1-3 scale for quick evaluations or advanced 1-9 scale for comprehensive analysis.

Category	Examples
Brand safety	Content authenticity, brand voice and message alignment, intellectual property protection, and ethical representation.
Compliance	Canadian privacy laws (PIPEDA, Quebec's Law 25), competition and fair trading regulations, advertising standards and deceptive marketing prevention, intellectual property and copyright protection, sector-specific regulations (i.e. OFSI for financial services), and comprehensive data governance requirements.
Operational vulnerabilities	System reliability, data quality, and cybersecurity concerns.

For marketers practicing internationally, don't forget to consider regulatory requirements in those jurisdictions.

The framework prioritizes risks using impact × likelihood calculations, enabling smart resource allocation.

High-priority risks require immediate action, medium-priority risks need planned mitigation within 90 days, and low-priority risks are included in regular review cycles.

# Brand safety: protecting content integrity

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Brand safety in the AI era extends far beyond traditional content concerns to encompass AI hallucinations, deepfakes, and algorithmic bias. AI systems can generate factually incorrect information, creating legal liability and damaging customer trust. Intellectual property violations occur when AI inadvertently reproduces copyrighted content, while brand voice dilution happens when over-reliance on AI creates homogenized messaging that lacks authentic personality.

Effective mitigation requires proactive human-AI collaboration rather than simple oversight.

- Implement multi-layer content verification processes combining automated fact-checking tools with human editorial review.
- Develop comprehensive brand voice guidelines integrated into AI training and prompting.
- Create feedback loops that continuously improve AI output quality while maintaining human creativity and judgment.

Establish crisis response protocols for when AI-generated content veers off course. This includes:

- immediate content removal procedures,
- customer communication strategies, and
- technical fixes to prevent recurrence.

Canadian brands that proactively manage these risks report significantly higher customer trust scores and faster recovery from content-related incidents.

# Compliance: navigating Canadian rules

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Canadian compliance for AI marketing extends beyond privacy laws, encompassing several regulatory areas that collectively determine your legal risk exposure and operational requirements.

Successful compliance requires considered implementation from the outset. This means building consent management directly into AI systems, ensuring data minimization principles guide data collection, and maintaining audit trails for all AI-driven decisions. Additionally, implement competition law safeguards to prevent algorithmic price coordination, establish content review processes to ensure AI-generated materials meet advertising and industry regulatory standards, avoid deceptive practices, and secure proper intellectual property rights for AI training data while understanding ownership implications of AI-generated content.

Implement regular compliance audits specifically focused on AI applications covering all the regulatory areas, train staff on Canadian compliance obligations and establish clear protocols for engaging legal counsel and compliance. When using third-party AI tools, ensure vendor agreements address data protection, compliance responsibilities, audit rights, and liability allocation for AI-generated outputs.

Organizations with proactive compliance programs are better positioned to prevent costly incidents and regulatory scrutiny.

# Operational risks: ensuring system reliability

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Operational vulnerabilities in AI marketing extend beyond traditional IT concerns to include model drift, algorithmic bias, and data quality degradation. AI model performance naturally degrades over time as real-world data patterns evolve, leading to declining campaign effectiveness and increased customer acquisition costs. Poor training data quality creates cascading operational problems, while system integration failures can disrupt entire marketing technology stacks.

Cybersecurity risks are amplified in AI systems due to large dataset requirements and the value of trained models as intellectual property. Adversarial attacks can manipulate AI outputs, while data poisoning can corrupt model training. The complexity of modern martech stacks, averaging over 120 tools, creates multiple failure points that require systematic monitoring and management.

Mitigation strategies focus on continuous monitoring rather than periodic checks.

- implement automated performance tracking for all AI systems,
- establish threshold-based alerts for performance degradation, and
- maintain rollback capabilities for quick recovery from failures.

Create comprehensive incident response protocols specifically designed for AI system failures, including automated failover procedures and stakeholder communication plans.



# Transform AI risk into your strategic advantage.

# Implementation roadmap: 3-month jump start

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Successful implementation follows a structured three-phase approach designed for busy marketing teams.

Phase 1 (Days 1-30) focuses on AI inventory and quick wins. Complete a comprehensive audit of all AI applications currently in use, classify risks using the 3×3 matrix, identify immediate risk reduction opportunities, and form a cross-functional AI risk team. This phase establishes baseline understanding and demonstrates early value.

Phase 2 (Days 31-60) emphasizes systematic assessment and priority action. Conduct detailed risk evaluations for each AI application, implement high-priority mitigation measures, develop vendor management protocols, and establish monitoring procedures. This phase addresses the most critical risks while building sustainable processes.

Phase 3 (Days 61-90) focuses on operational integration and continuous improvement. Embed risk assessment into campaign workflows, train team members on the framework, establish regular review cycles, and create reporting dashboards. Target outcomes include fewer AI-related disruptions to campaigns, faster approval processes for new AI tools (5 business days vs. typical 3-4 weeks), and the confidence to scale successful AI applications quickly.



# AI Risk Assessment Use Guide

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Start with this assessment that takes 10-15 minutes per AI tool and identifies your highest-priority risks so you can focus resources where they matter the most.

## Customization Guidelines

- Modify risk categories based on your sector and organization's specific AI use cases and risk tolerance.
- Adjust compliance categories based on your geographic operations and industry regulations.
- Review with legal, IT, and business teams to ensure all relevant risks are captured.

## Scoring guide (adapt thresholds based on your risk tolerance)

- 1-3 (low risk): Adequate controls in place, minimal potential impact.
- 4-6 (medium risk): Some controls present, moderate potential impact requiring attention.
- 7-9 (high risk): Limited or no controls, significant potential impact requiring immediate action.

## Priority actions (adjust timelines based on your organization)

- Scores 7-9: Address within 30 days or immediate action required.
- Scores 4-6: Address within 90 days and planned mitigation needed.
- Scores 1-3: Include in next quarterly review, monitor and maintain.

## Assessment details

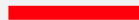
- Assessment date
- Assessor
- Name of AI system/tool assessed
- Next review date

# AI Risk Assessment Template

Complete this for each AI tool you currently use. Start with your most business-critical applications first. Rate each risk area from 1-9 based on current AI implementation. Use the scoring guide.

Risk category	Current score (1-9)	Priority level	Next action required
Content accuracy and factual verification			
Brand voice consistency and authenticity			
Algorithmic bias and fair representation			
Privacy and data protection			
Competition and fair trading safeguards			
Deceptive marketing practices			
Intellectual property and copyright protection			
AI model performance and reliability			
Data quality and integrity			
System integration and compatibility			
Cybersecurity and access controls			

# AI risk register template



Create a spreadsheet with the following columns and transfer risks identified from the one-page assessment. Assign specific owners and realistic target dates.

Column	Header	Data Type	Instructions
A	Risk ID	Text	Use format: BR-001, CO-001, OP-001 (Brand/Compliance/Operational + sequential number)
B	Risk description	Text	Clear, specific description of the risk in 1-2 sentences
C	Category	Dropdown	Brand Safety, Compliance, Operational
D	Impact (1-9)	Number	Potential consequence severity if risk materializes
E	Likelihood (1-9)	Number	Probability of risk occurring in next 12 months
F	Risk score	Formula	=D×E (Impact × Likelihood for prioritization)
G	Current controls	Text	Existing mitigation measures or safeguards in place
H	Risk owner	Text	Specific person responsible for managing this risk
I	Target resolution	Date	Deadline for implementing mitigation measures
J	Status	Dropdown	Not Started, In Progress, Complete, Ongoing Monitoring
K	Last updated	Date	Date of most recent status update
L	Notes	Text	Additional context, progress updates, or issues

# Monitoring success and continuous improvement

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Effective AI risk management requires ongoing monitoring and adaptation rather than one-time implementation. Track these business outcomes:

- faster AI tool approval and deployment (target: 5 business days);
- reduced campaign disruptions from AI-related issues;
- increased confidence to scale successful AI applications; and
- competitive advantage from systematic AI adoption vs. ad-hoc competitor approaches.

Establish regular review cycles tailored to risk levels:

- monthly assessment for high-risk applications like AI-generated public content;
- quarterly reviews for medium-risk tools like predictive analytics; and
- annual evaluations for low-risk productivity applications.

This tiered approach ensures appropriate attention without overwhelming team resources.

Continuous improvement mechanisms include systematic learning from incidents, regular benchmarking against industry best practices, and adaptation to evolving regulations and AI capabilities. Canadian market considerations require attention to sector-specific requirements in financial services, healthcare, and government contexts, each with unique risk profiles and regulatory expectations that influence framework application.

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# Recommended reading and references

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## CMA resources

- [CMA Mastery Series: AI Playbooks](#)
- [CMA Guide on AI for Marketers](#)
- [Setting the Stage on Artificial Intelligence: A CMA Primer on AI for Marketers](#)
- [CMA Accountability Checklists for AI In Marketing](#)
- [CMA Transparency for Consumers Guide](#)
- [CMA Application of Law 25 to Marketing Activities Guide](#)

## Key resources and references:

- Vector Institute: [AI Trust and Safety](#)
- ISO/IEC 42001:2023: [International AI management system standard](#)
- NIST: [AI Risk Management Framework](#) (Official U.S. framework adaptable for Canadian context)
- Australian Government: [Engaging with Artificial Intelligence](#)
- Canadian Government (ISED): [Implementation guide for managers of Artificial intelligence systems](#)

# The CMA

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This playbook is developed with guidance by the CMA AI Committee and is part of the CMA's comprehensive AI initiative designed to empower Canadian marketers with the knowledge, skills, and ethical frameworks needed to implement AI responsibly and effectively.

As the voice of Canadian marketing, the CMA champions our profession's powerful impact. We are the catalyst to help Canada's marketers thrive today, while building the marketing mindset and environment of tomorrow.

We provide opportunities for our members from coast to coast to develop professionally, to contribute to marketing thought leadership, to build strong networks, and to strengthen the regulatory climate for business success. Our Chartered Marketer (CM) designation signifies that recipients are highly qualified and up to date with best practices, as reflected in the CMA's Canadian Marketing Code of Ethics and Standards.

We represent virtually all of Canada's major business sectors, and all marketing disciplines, channels and technologies. Our Consumer Centre helps Canadians better understand their rights and obligations.

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