Amity Business Journal
2026, Vol. IX, No. 1 (Print ISSN: 2278-0904)

Theoretical Perspectives and Governance Framework for the Ethical use of Customer Data

Dr. Bhavna Sharma[1] **Dr. Palki Sharma[2]**

The paper identifies the governance structures needed for ethical collection and processing of customer data as well as its dependencies on privacy theoretical constructs that have been developed from over six decades of philosophical thought and examines ethical philosophical thought in conjunction with relevant regulatory frameworks.

Design/methodology/approach: The paper synthesises the classical ethical framework with current empirical and policy-based literature that has been published between 2023 and 2025. A conceptual governance model (TAFA - transparency, agency, fairness, and accountability) has been developed to synthesise how ethical principles can inform responsible customer data management.

Findings: The findings of the analysis suggest that transparency and user agency mitigate the potential for power asymmetries. This paper combines these challenges into one governance framework with an emphasis on ethical decision-making at each step of developing customer data privacy processes, privacy-by-design, algorithmic transparency, and participatory data practices.

Originality/value: This paper synthesises existing theoretical and empirical governance models for the ethical collection and usage of customer data with a unified approach grounded in the evolving literature. This paper also addresses emerging issues related to the change of the market from traditional to a more knowledge-based economy characterized by AI-driven profiling and increasing power imbalances between company and customer.

Keywords- Customer data, data ethics, data governance, TAFA framework.

1. Introduction

Data is the foundation for the Digital Economy. Customer data enables organizations to provide personalized services, generate value, and create a competitive advantage. To this end, the proliferation of data-centric businesses raises ethical questions about privacy, consent, autonomy, and fairness (Acquisti et al., 2015). Many organizations are following Regulations, e.g., GDPR (European Union, 2018) and CCPA (State of California, 2020) to develop guidelines for responsible use of customer data. However, governing ethical customer data use can be challenging because 'privacy laws' do not solely dictate what constitutes 'ethical'. Moreover, organisations must also consider the evolution of societal expectations surrounding digital Trust, Transparency and Accountability relating to customer data (Martin & Murphy, 2017). In several recent studies completed between 2020 and 2025, algorithmic bias, lack of transparency in AI-based systems, the excessive collection of data, and the architecture of Surveillance Capitalism (Zuboff, 2019; Narayanan, 2023) have all emerged as significant challenges in terms of managing data responsibly.

1) Department of Management & Commerce, Mangalayatan University, Jabalpur, Madhya Pradesh. bhawna.sharma86@gmail.com

2) School of Management Studies, CGC University, Mohali-140307, Punjab, India. palkisharma770@gmail.com

2. Literature Review

Using theoretical lenses to develop a comprehensive governance framework will support ethical use of customer data. Organizations now using increasing amounts of customer data for the purposes of personalization and developing new products, targeted marketing, predictive and analytical solutions. While the ability to utilize customer data creates a type of "value," both economic and social; it creates ethical issues around privacy, consent, autonomy, manipulation, inequitable outcomes, etc. Regulatory changes (i.e. GDPR, CPRA-like provisions, DPDP) and detailed governance documents (OECD 2019; IAPP 2020) indicate that legislators will be looking seriously at addressing these ethical concerns. Additionally, the academic research into customer data ethics has been added to by applying classical ethical frameworks, such as Deontological, Consequentialism, and Virtue Ethics with modern theories related to surveillance capitalism and algorithmic fairness. In this paper, we will combine these areas of scholarly work and develop a framework for creating a Conceptual Governance Framework (TAFA), which can be put into practice for organizations to meet regulatory and

stakeholder expectations, as well as create and operationalize ethical standards of customer data use. The Ethics of Customer Data Literature Review The Ethics of Customer Data academic literature encompasses Privacy Theory, Normative Ethics, Critical Analysis of Data Capitalism, Algorithmic Fairness Studies, Organizational Trust, and Political Studies. Foundations of Privacy Theory, Ethics and Governance in Data-Driven Systems The study of Privacy Theory is considered foundational for the understanding of how people view and interact with the way that organizations use data. The early Privacy Theory conceptualized Privacy as the person's right to control personal information (Westin 1967); which is a major driver of consent-based policy approaches. Recent research has demonstrated that control is not sufficient alone in the management of complex digital settings. Contextual integrity proposed by Nissenbaum transforms the concept of privacy to refer to the suitability of data flow (using the data in specific ways) for representative social contexts, and therefore that violations of privacy are based not on data collection but instead on using it in violation of contextual norms (Nissenbaum, 2004; 2010).

In current AI enabled commercial environments, this theory is relevant because data collected in instances such as online shopping or online social interaction is also used to create profiles, predict behavior, and target behavior which are frequently referenced as context collapse (Solove, 2013; Narayanan, 2023). Ethical theories continue to inform the examination of data practices, in those deontological theories view responsibility as the ethical obligations of individuals toward society, through honesty, openness, and respect for individual rights; each aspect shows the ethical importance of informed consent and fair treatment (Floridi, 2013). By contrast, consequentialist theories focus on weighing the advantages (personalization, efficiency, etc.) of collecting and using data against its disadvantages (discrimination, exclusion, a loss of trust, etc.); the result of this evaluation will indicate how ethical data use is (Mason, 1986; Taddeo & Floridi, 2018).

Virtue ethics introduces another important aspect to the discussion about ethical data governance: it considers the character of organizations, their moral cultures, and their responsibilities as institutions and states; it indicates that how well organizations internalize ethical standards will also play an important role in how they conduct ethical data governance (Mittelstadt, 2017; Moor, 2006). There is increasing support in current policy synthesis for the notion that there is not a single ethical framework that will work on its own. Instead, it is more likely that a pluralistic approach is required to address the many complexities of today's digital ecosystem (OECD, 2024).

Furthermore, an increasing number of critical scholars have shifted the focus of their research to examine the structural dimensions of the data-driven business model (Zuboff, 2019). Zuboff's term "surveillance capital" refers to the systematic commodification of individual data to predict and control behaviour, thereby creating an extreme power imbalance between the corporation and the individual. This difference in power has increased with the development of AI, how people use large-scale analytical tools and algorithmically opaque systems (Crawford, 2021). Because of these developments, all critiques of ethical governance now recognise that in addition to giving individual consent and/or preventing individual misuse, ethical governance must also establish a foundation that addresses the broader economic and institutional incentives inherent in the extraction of huge quantities of personal data by digital firms (Curran, 2023; Veale & Binns, 2022). The need for strong governance of algorithms is driven by concerns about fairness and bias. Empirical and theoretical research have shown that algorithms and automated systems recreate and exacerbate current social inequalities; for example, automated systems have been shown to increase inequality in credit scoring, pricing and personalizing. There is an emphasis in recent literature for explainability, interpretability, and auditability of an AI throughout its entire lifecycle. New regulations and the emergence of unique AI legislation are putting pressure on organizations to demonstrate accountability and risk awareness for high-impact AI applications.

Additionally, there are many studies within the fields of behavior and organizations that show how ethical governance relates to consumer trust. The findings of the studies have been very consistent in that trust and willingness to share data depend on transparency and perceived control over how their information is being used, particularly in situations with a privacy paradox. There is a trend toward formalizing or institutionalizing the ethical responsibility of

organizations through the establishment of formal roles, policies and standards to guide ethical behaviour of the organization. Therefore, ethical data governance is an integral component of a responsible and trustworthy digital ecosystem and is therefore more than just a legal obligation.

Regulatory and Governance Developments (2023–2025) Regulatory momentum is accelerating based on continued enforcement of GDPR, continued developments of local state legislation like CCPA/CPRA, and new national legislation such as India's DPDP/DPDPA providing new obligations on business for the use and treatment of data. The OECD 2024 report demonstrates strong synergies between the governance of AI and Privacy, calling for more harmonised approaches in this area. Ongoing incidents in the industry (including scrutiny from regulators of the use of used of data to produce AI models), and ongoing audit work performed by various Governments (between 2024 and 2025) are evidence that corporate governance regarding the use of AI and the respective consent practices used during the training of that data is under review by the regulatory authorities (Guardian 2024, Queensland Audit Office 2025).

3. Methodology

By using a combination of definition- and reference-based study, the research synthesises a wide-ranging compilation of academic and other information regarding the governance of customer information in an ethical manner within an interdisciplinary milieu. In other words, this method doesn't involve testing via empirical means to evaluate hypothetical causal relationships but instead draws connections between several fields' theoretical models/ concepts to create a transparent model that serves as a common understanding across all areas of organisational behaviour related to the ethics of customer information governance. In many instances, the field of ethics has not been established enough for researchers to completely clarify the essential characteristics of its theoretical models, therefore the use of conceptual approaches is especially useful within newly emerging or complex fields of research that are either currently evolving quickly (i.e., artificial intelligence ethics) and/or where the body of literature surrounding such fields are in the process of formation (i.e., data governance) (Mittelstadt, 2017; Floridi, 2013).

The literature collected for this research project includes sources from various disciplines such as ethics, information systems, law, AI governance, and business; this is a reflection of the fact that the ethical governance of customer information is an inherently interdisciplinary topic. The sources of literature selected for this study were obtained through publications published within a 2010-2025 timeframe; however, emphasis has been placed on works published between 2018 and 2025, since this period has historically experienced further significant advancement in the field of AI and the corresponding implementation of data governance regulations. The body of literature reviewed includes peer-reviewed journals, leading academic texts and policy documents published from many different types of organisations, as well as significant industry and government reports. The three primary sources that contain key institutional data related to this research are the OECD, the European Union and professional organisations such as IAPP; analytical perspectives of a practitioner-oriented nature have also been collected, particularly from the Harvard Business Review.

Examining the selection of literature based on how it relates to the Core Themes listed below. Instead of trying to create a comprehensive list of all studies published, this study focuses more on high-impact & heavily cited work that has had a significant effect on current discussions around Privacy and AI Ethics (Nissenbaum, 2010; Solove, 2013; Barocas & Selbst, 2016). After initially reviewing all materials, I will then identify Patterns of Recurring Ideas, Areas of Conflict and Research Gaps among each of these three major categories.

By concentrating on how to bring together theories and concepts rather than through the use of statistical validation of a hypothesis, the focus of the methodology is on integrating theory and synthesizing concepts to develop a structured and analytically sound framework for Ethical Governance of Customer Data that guides how organizations can approach ethical governance of Customer data in a way that integrates and aligns ethically with their respective ethical practices.

4. TAFA Framework: A Human-Centered Theoretical and Governance Model

This framework synthesizes findings taken from research in three fields (business ethics, data

governance, and artificial intelligence) into one practical, ethical model for governing the use of Customer Data by organizations. Because of an increased reliance by organizations on Data Driven Systems and Artificial Intelligence Systems, organizations' ability to meet their strategic Intent vis-a-vis Customer Data has shifted from being peripheral to being integral to the decision-making process of all organizations. TAFA Framework is based upon the concept of Governance as being explicitly related to the Governance of Customer Data and is a framework. The framework has four distinct but interconnected categories that all provide a unified and connected approach to the Ethical Governance of Customer Data; namely: Transparency, Agency, Fairness, and Accountability. Unlike a traditional compliance-based approach, TAFA takes the view that ethical governance is a continual commitment on the part of the organization and is shaped by Human Values, Institutional Choices, and Technological Decision Making.

The first of the four pillars that TAFA is based upon is Transparency and it refers specifically to the Organizations obligation to be transparent and forthcoming with respect to how it gathers, collects, utilizes, stores and distributes Customer Data. The transparency of most companies is demonstrated primarily through very long and complicated privacy policies, often written in extremely technical, legalistic language, that not many users read or really understand. Employers and/or companies that provide 'meaningful' transparency (TAFA) try to communicate in a way that is clear, accessible and addresses concerns by 'real' users about how their data was used.

Users want to know what types of information are collected about them; the reason for that collection; the duration of time the information will be retained; the impact of the use of automated systems on their decisions. In addition, tools, such as simplified disclosures and layered notices, as well as AI 'nutrition labels', can help users comprehend the technical complexity of their personal information in an understandable manner. With this being said, when meaningful transparency is viewed as a real dialogue and not just an obligatory legalism, it will be the foundation to building a trusting relationship. However, transparency alone is not adequate. Therefore, the translation of information to Agency (the second of three pillars of the TAFA framework) must occur. Agency is the embodiment of a user's ability to exert control over the data that is considered 'said user from either an individual or a group perspective'. This right/ability would include an individual being able to provide informed consent for the use of data collected about that user, opt-out of data collection, amend erroneous data, to transfer data from one data platform to another, and to delete said data when necessary.

An important factor to consider with respect to Agency is that Agency can be contingent upon how it is designed. For instance, when the process for providing consent is difficult to comprehend, coercive, and/or difficult to rescind, it will have a negative effect on a person's autonomy and not a positive effect. To that end, ethical data governance aims to create an ethical design for a given organization through the development of systems that value the time, attention, and decision capability of the user. The development of user agency is not limited to policy statements but also involves the design of a thoughtful system as well as the development of responsive organizational procedures to facilitate the development of user agency. The ethical nature of agency supports the ethical organization because it values the individual as an autonomous individual rather than a passive data source. Given the increasing use of data-driven personalization and automated decision-making, protecting user agency is becoming increasingly complex.

The TAFA recognizes the clash of these tensions and believes that ethical organizations must take action to alleviate the power imbalance that exists between the individual and the data holder. When users are provided with real choices, and their preferences are taken into consideration, the data relationship can shift from a focus on exploitation to one of collaboration. Fairness is the third key principle, and one of the main issues facing contemporary AI/data governance is the risk of unjust and biased outcomes. Algorithms are increasingly used to determine how pricing, credit access, hiring, and customer segmentation occur. While promise of AI and automated decision-making is to create greater efficiency and objectivity, they regularly reproduce existing societal inequalities that were present within historical data.

The TAFA identifies fairness as an outcome-based principle and evaluates how data practices

affect the group and the individual based upon the perspective of the individual receiving the data (the user). Organizations must continually evaluate the systems they develop to ensure that they are using their data fairly. Fairness cannot be achieved once, but must be continuously monitored through bias audits, impact assessments, and diverse and representative data.

The TAFA Framework acknowledges that fairness is contextually dependent and socially defined - ie. what is to be seen as "fair" may differ from culture to culture and regulatory environments. Due to the differences in how fairness is defined, ethical data governance must be adaptable and respond to feedback and input from stakeholders who are affected by the use of data.

The TAFA Framework emphasizes the importance of fairness, leading organizations to broaden their view of their data and data-related decision-making by considering how it impacts the world around them, not just the organization itself, via Technical Performance. The fourth part of the TAFA Framework is Accountability. Accountability provides a framework for the Ethical Obligations that organizations voluntarily undertake; it provides organizations with a concrete process for creating and enforcing those commitments. Organizations can create and enforce Ethical Accountability through Data Ethics Committees, the appointment of Privacy Officers/ Privacy Data Protection Officers, and by defining the roles and responsibilities of the various Teams within Organizations.

In addition to Ethical Accountability, organizations can also enhance their Ethics through the development of and implementation of technical solutions such as Electronic Access Controls, Encryption, and Audit Logs, which help organizations establish clear lines of sight over the use of their Data.Importantly, TAFA recognizes that organizations must be accountable for their Ethical Accountability, not just for their own actions, but for the actions of Third Parties and/or Service Providers, and/or Data Processors, and that Ethical Risks exist within the Context of Complex Data Ecosystems and are managed in this Framework.

Accountability also has a moral component, which signifies the Integrity of an organization and its willingness to accept responsibility for its actions. An organization's character and acceptance of responsibility for its actions is expressed through its governance system. The TAFA framework provides individuals with an opportunity to have control over their data by creating systems of accountability and transparency. Ethical governance does not only rely upon an organization's intentions, but also how organizations handle complaints regarding data misuse and harm. In that sense, the TAFA framework proposes that a grievance mechanism with an effective remedy for individuals harmed as a result of their information being used/ misused is necessary to promote ethical use of data.

The uniqueness of the TAFA framework lies in its integration of four primary components (transparency, agency, fairness, and accountability) because collectively these components support each other. Transparency enables individuals to make informed choices; agency brings fairness concerns to the surface when users question or challenge automated decision-making outcomes; fairness assessments are dependent on accountability structures to ensure that users' identified problems lead to substantive change; and strong accountability increases the credibility of transparency by ensuring that the disclosures about the organization's data use practices are accurate and truthful. Collectively, these interactions support the creation of an integrated/holistic system of ethical governance versus four individual/principle-based processes that each operate independently of the others.

The TAFA framework combines the ethical theories discussed above with practical governance tools that have been recommended in the most recent policies and guidelines in order to create a pragmatic process for organizations to develop an ethical means for managing customer data. The TAFA framework demonstrates that ethical data governance is integral to the development of innovation in the field of data and is also necessary for the long term sustainability of that innovation. Ultimately, TAFA positions trust, responsibility, and respect for human agency at the heart of data-driven business, reminding organizations that behind every data point is a person whose interests and dignity deserve careful consideration (OECD, 2024; IAPP, 2024).

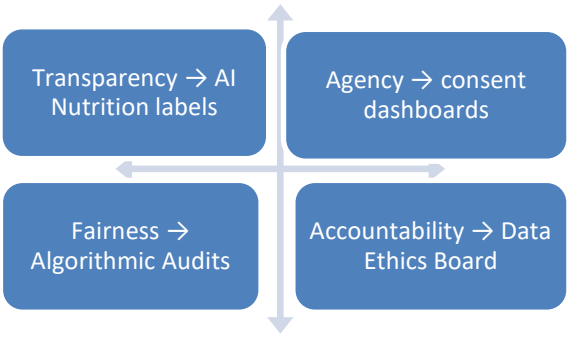

Figure 1.1 compiled by author (TAFA Framework)

Figure 1 (suggested): A diagram showing TAFA as matrix with brief examples of operational mechanisms in each pillar. (e.g., transparency → AI nutrition labels; agency → consent dashboards; fairness → algorithmic audits; accountability → data ethics board).

5. Discussion

5.1 Operationalizing TAFA in Organizations

Implementing TAFA requires cross-functional processes: legal teams must work alongside data scientists to translate regulatory obligations into system design; marketing and product teams must align data collection with declared purposes; and executive leadership must empower data ethics governance structures. The following practical measures can reduce data use risks: develop Policy Enforcement Procedures based on Purpose Limitation principles; revisit your Consent User Experiences using a UX design-centric approach; create Model Cards and Data Sheets based on your business case; conduct an Appropriate Due Diligence review of third parties that you may transact with ('Related-party Transactions and Due Diligence'); and perform Regular Testing for bias connected to the use of data by your organizations (Ferrara, 2023; Chen et al., 2024).

5.2 Regulatory compliance- It is the lowest bar Regulators seek to achieve, and many regulations will be met by practice under TAFA In that way, ethical practice under TAFA will go above and beyond Regulators seeking merely to provide Compliance. For example, activities that are legally permissible but also violate the ethical rights of Autonomy or Fairness would contradict the General Principles and Substantive Commitments established under TAFA (Richards & King, 2014; OECD, 2024).

5.3 Specific Sectoral Nuances, Encode and Take into Account- Relative Risk Sensitivity When Establishing Governance Structures There are different ethical implications associated with the use of AI in health care, financial services and Public Sector operations. For example, based on research that has been conducted within the Context of Domain Studies in Health and Wearables and in AI, Research shows that (Radanliev et al., 2025) there are considerable differences between the governance structures utilized in these sectors, based on User Informed Consent that reflects Clinical Stakes and by establishing greater accountability requirements for AI usage.

5.4 Creating New Governance Structures in Response to Business Model- Extractions of the Behavioural Surplus of an Individual Expands on TAFA and guiding Governance Discussions and Creation of New Governance Structures. Current Business Models will require structural changes to reduce the Incitement for Excessive Data Collection (Zuboff, 2019; Curran, 2023). The development of new business models will provide business entities with Policy options as well as create corporate covenants, such as limiting Data Retention for purposes of Profiling.

6. Implications of the TAFA Framework

The TAFA framework is a significant influence on how ethical governance of customer data is thought by researchers, organizations, and lawmakers. The TAFA Model provides evidence that ethics cannot be viewed as separate concern or as an obligation to confirm only after the establishment of regulatory requirements. Instead, the ethical governance of data results from the ongoing conversations taking place among the components of the TAFA model (transparency, agency, fairness, and accountability). By integrating these components, the TAFA model encourages scholars to transform their thinking about ethical governance from the view that is only a hindrance to the view that it is an integral part of creating trust in our data-driven world and creating legitimacy for the Data Economy. The TAFA framework will also assist scholars in a theoretical sense, as it is evident that there is no single ethical theory that can adequately address the challenges that AI and Big Data create. The concept of TAFA connects the ethical theories based on actions (rules-based ethics) to the ethical theories based on the achievement of positive outcomes (outcomes-based ethical), but with organisations viewed as virtuous, as they have a moral responsibility to the public. Therefore, scholars using the Transparency and

Agency Framework, or TAFA, need not choose between these models. Rather than maintaining a singular focus, TAFA offers a unifying framework for several distinct approaches to evaluating business models. The framework provides a connection between how both transparency and agency affect individual liberties, how fairness affects people's real-world experiences, and how accountability relates to the organization's moral obligations to the members of society it serves. An understanding of the way these various perspectives on ethics can interact will yield a more complete understanding of how ethics operates within complex data-driven organizations. Because of its focus on process, interaction, and learning, TAFA is a compelling method for the future study of ethical governance because it encourages researchers to think in a more dynamic fashion regarding the evolution of ethical behavior over time, how organizations will respond to the occurrence of unethical acts, and how stakeholder comments will impact governance structures.

Overall, TAFA supplies Researchers with a broader foundation for understanding the real-world ethical behaviours of businesses than what previous techniques provided by concentrating exclusively upon theory. Consequently, TAFA's practical application will be immensely advantageous to the practitioners of ethical conduct. Managers often struggle with turning theoretical ethical principles into actual decisions concerning the collection of data/analytics as well as AI deployment within their own respective organisations.

TAFA provides a straightforward yet versatile structure that enables managers to determine how these decisions will be made throughout the whole organisation. The concept of Transparency defines the manner by which an organisation engages its consumers; the idea of Agency defines the manner in which the End User's experience is constructed and how their Consent is given; Fairness defines how an organisation accesses/garner data or the evaluation process used when developing models from raw data; and Accountability validates leadership's commitment to ethical behaviour by establishing methods of governance. TAFA advocates for a comprehensive examination of ethical considerations of data/analytics and AI by drawing attention to the relationship between the various ethical considerations that exist around these elements. Furthermore, TAFA emphasises the role of organisational culture in determining how an organisation applies ethical principles. Ethical data governance is not limited to creating policies and technical controls but also focuses on how employees perceive their own accountability for ethical behavior; this perception is further influenced by the way in which leaders model ethical behavior. Therefore, when transparency, agency, fairness, and accountability are embraced as part of an organization's values, employees will be more inclined to question practices that seem unethical or become concerned with those activities over the course of time. With respect to the design of technology, TAFA underscores that ethical outcomes are determined long before systems are actually installed and/or used. When organizations make decisions concerning the default privacy settings and the configuration or detailed steps required for providing consent, how long the organization keeps data after it is collected, and what the organization is measuring when evaluating the performance of the model, implicit assumptions about the end-user and/or value are being made by these decisions.

TAFA provides a framework for designers and engineers to build technology with a human-centered perspective by enabling companies to address issues of agency, transparency, and fairness at the time of design. This proactive approach will help to ensure that corrective measures are not needed after harm is done and aligns with the concepts of “ethics through design” and “responsible artificial intelligence,” which are already being developed. In addition to its use by designers and engineers, TAFA has many implications for regulators and policymakers. Regulations generally create specific obligations for businesses or individuals, while TAFA provides insight into how these different types of obligations work together through everyday implementation. Regulatory agencies can make use of existing frameworks like TAFA in determining where compliance with regulations aligns with an agency’s goal of giving people control over their personal information and acting on instances of systemic discrimination, as well as ensuring that companies are held accountable for their actions. Therefore, in this rapidly changing landscape of technological innovations, using a principled approach to regulating businesses can offer

greater adaptability for businesses than simply following the rules of a number of prescriptive regulations.

One of the primary advantages of TAFA is that it helps instill confidence in technology among the general public. Increasingly, consumers are looking beyond just knowing their private data is protected; they are also learning about how they are being treated by the entity collecting their information. A commitment to adopting TAFA-aligned business practices demonstrates a higher level of ethical accountability for organizations. In doing so, organizations have a much better chance of forming long-term partnerships both with customers and society as a whole. According to TAFA, a good ethical data governance system is not just a good idea, it is a critical component of legitimacy and trust.

7. Limitations of the Study

The research has many limitations even though it has contributed greatly to knowledge on ethical data governance. The TAFA conceptual framework relies on surveys of previously published academic literature vs. direct empirical testing, which provides many domains with a theoretical foundation for application, but it does not provide any evidence that this framework will occur as desired in the actual organizational context(s). There remains uncertainty as to whether the TAFA framework when applied in organizational settings will produce the desired construct for organizations such as user trust, producer accountability, and organizational performance. This reliance on secondary source information limits the insights into the ways the ethical data governance framework is understood and implemented by respective stakeholders.

Most of the available academic and policy literature is produced from both institutional perspectives and does not provide the opportunity for users, organizational line staff, or marginalized communities to provide their perspectives or experiences. Subsequent research through interview, case studies, or participatory analysis will help to build on these findings within the ethical data governance framework by determining how transparency, agency, fairness and accountability are perceived and actualized through stakeholder-level engagement. Research on how the TAFA framework can be applied concretely within an industry will serve to further ground the framework in actual lived experience.

The flexibility of the TAFA framework is a limitation because it is an open-ended, flexible framework that can be applied to many different sectors, contexts, and industries. However, this flexibility may also confuse people trying to implement the framework into their organization because the TAFA does not have explicit guidance on that area, such as what tools, metrics, or governance structures should be utilized. Instead, TAFA has established a set of guiding principles for organizations to utilize and develop their own interpretations. As a result, there is a burden placed on organizations to create tangible operational practices based on their resources, sector, and the regulatory environment in which they operate. Future research could fill this gap by creating toolkits or sector-based adaptations of the TAFA framework.

The fast-paced nature of data governance is another limitation to the TAFA framework. Because data and technology continue to evolve rapidly, the ethical and moral expectations concerning data governance will change in conjunction. Therefore, the governance practices discussed within this paper will likely need to be adjusted and revised as the usage of new types of data and AI-neural networks become established. As a result, TAFA must be viewed as a "living" framework. Therefore, it is crucial for organizations to constantly evaluate their practices in relation to TAFA because of the rapidity with which changes occur regarding data technology and regulation.Cultural and contextual differences will limit the universality of this framework. The above sections are a few examples of the issues that an organization may face when implementing TAFA in its particular sector or industry. Ethical norms and expectations vary across societies, and what counts as meaningful transparency or acceptable data use in one context may not translate directly to another. While TAFA is designed to be adaptable, its application may look very different across regions and cultures. The use of TAFA as a research tool can help organizations identify potential ethical dilemmas when using customer data in different countries. Cultural values affect how the framework is interpreted and implemented by each country's unique set of laws and regulations. The use of TAFA does not

remove the need for research on ethical decision-making processes.

As stated previously, organizations deal with many competing interests while making decisions regarding customer data. Each of these interests creates tension and conflict between the different values of the stakeholders involved in the decision-making process. The TAFA framework acknowledges these tensions but does not provide an answer to them. Therefore, additional research is necessary to identify how organisations address these conflicts and navigate through them while being accountable and thoughtful in their decision-making process. While the TAFA framework provides a starting point for organisations to evaluate how they are ethically using customer data, it does not represent a finished model or system. It also highlights the need for further research in order to better understand how organisations can implement a robust governance framework that incorporates ethical ideals.

The intent of TAFA is to be a flexible tool and support the creation of data governance systems that respect human values, and will likely look different in different cultures/ regions. Comparative research throughout different jurisdictions will give greater insight into how Culture values are influencing the Jurisdiction Methodology's interpretation and implementation. TAFA does not address Ethical Trade-Offs: Many organizations struggle with the tension between wanting to be transparent while protecting their proprietary information. Furthermore, organizations need to balance increasing User Agency versus offering Innovation through the use of Data, as well as determining what is Fair and Accurate in a Predictive context.

The framework does acknowledge the above-listed tensions, but it does not offer any simple answers to address them. This recognition indicates that ethical governance is based on judgment and deliberation, and therefore cannot be answered through formulaic means. Future research may investigate how organisations go through the process of making decisions to resolve these ethical trade-offs in a thoughtful and accountable manner. To summarise, the TAFA framework can serve to establish a basis for understanding how to ethically govern customer data, but it does not provide a prescriptive model of ethical governance. Additionally, the limitations of the framework display the necessity for future research to validate the framework's empirical variables, to properly contextualize the framework's principles of ethical governance, and to promote continuing education for users of the framework when developing their own data governance practices to ensure that ethical governance respects human values in all facets of the events surrounding the use of data.

8. Conclusion

As organizations leverage customer data and grow reliance on AI-driven technologies, ethical governance has transitioned from "optional" to "the only way to ensure the ethical use of AI and customer data." Organizations are now working within digital environments where there is an abundance of data, and decisions are made through automated processes. Additionally, decisions made with data-driven tools and personalization technologies are increasingly obscure from those who will be impacted by those decisions. Organizations must address the ethical challenges of situating technology in an evolving environment with a unified approach to ethical principles, structure and technology. Therefore, the ethical governance of customer personal data should be developed as a unified approach through a Human-Centred perspective; not as an isolated and fragmented way.

The TAFA framework (Transparency, Agency, Fairness & Accountability) is one example of a unified approach to ethical governance. When the pillars of TAFA work together, they provide a way for organizations to create both a rigid, yet flexible structure for how ethical principles will be used within day-to-day operations. By using the four TAFA pillars to create an Ethical Data Governance framework for their organization, businesses will develop an environment where their customers can easily navigate their data. Fairness highlights the practical impact of data-driven decision-making on customers and the potential for disadvantaged customer groups to be impacted by biased data-driven systems. Organizations that have a responsibility to their stakeholders are committing to act ethically and therefore have a vested interest in creating support or infrastructure that will assist them with being able to be accountable when they harm someone. The TAFA framework focuses on interactions as the foundation for establishing ethical governance rather than isolation.

Development of Ethical Governance cannot occur through only being transparent or through the establishment of a governance model that supports any of the four pillars (agency, fairness, accountability) as each pillar supports one another in practice. Transparency provides individuals with agency and within that agency comes the realization of fairness therefore producing a demand for accountability; whereby Accountability is the reinforcement of individuals' trust in Transparency. This interaction demonstrates the reality that ethical challenges are always present within an organization and require ongoing reflection, adaption, and learning. By establishing a link between the theory of ethics and the practical responsibilities of Governance, TAFA is a resource for multiple stakeholders.

For Organizations it serves as a resource for embedding Ethics into the Strategy and Culture of the Organization in addition to Governance models and Systems. For Researchers it provides a theoretical foundation for studying Ethical Data Governance as a Process that is shaped by the Choices of Humans and the Context of Institutions. Organisations can support the creation of ethical data ecosystems that are efficient yet equitable, transparent, and that inspire public confidence in them, by creating governance models which promote the protection of individual rights, the reduction of harm, and the enhancement of accountability. Therefore, presented through the lens of the TAFA model, ethical data governance is not an ultimate destination but an ongoing process - allowing for continued dialogue, experimentation, and refinement as technology and societal norms change.

One of the positive benefits of TAFA is that it allows organisations to keep ethical governance of their customer data process close to human values, and therefore creates a strong foundation for future governance practices.

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