

FLORIDA DEPARTMENT OF FINANCIAL SERVICES

CHIEF FINANCIAL OFFICER DIRECTIVE 2025-01

WHEREAS, DeepSeek is a Chinese artificial intelligence (AI) company that has developed large language models and AI assistants, with about 6 million active users globally and more than 7 million Google searches per day.

WHEREAS, DeepSeek is owned by the company High-Flyer, which is headquartered in Ningbo, in the Zhejiang province of China.

WHEREAS, DeepSeek captures vast swaths of data from its users, including date of birth, email address, phone number; any text or audio input, prompts, downloaded files, feedback, chat history, and any other content shared with the service; device model, keystroke patterns, IP address; login information if the user logs in through a third-party service like Google or Apple; and payment information.

WHEREAS, DeepSeek has already suffered a data breach affecting over a million sensitive user records, and during a Cisco test failed to block a single harmful prompt – showing the system is susceptible to cybercrime, misinformation, illegal activities, and general harm.

WHEREAS, DeepSeek has ties to computer infrastructure owned by China Mobile, a telecommunications company controlled by the Chinese Communist Party, which was prohibited from operating in the United States by the Federal Communications Commission due to national security concerns.

WHEREAS, Article 16 of China’s 2017 National Intelligence Law authorizes Chinese intelligence officials to “enter relevant restricted areas and venues; learn from and question relevant institutions, organizations and individuals and *read or collect relevant files, material or items.*” (emphasis added).

WHEREAS, users who create a DeepSeek account may unknowingly be making their identities, search queries, and online behavior visible to the Chinese government.

WHEREAS, the State of Florida considers the People’s Republic of China as a foreign country of concern by the State of Florida, pursuant to section 112.22(1)(c), Florida Statutes.

WHEREAS, Department of Financial Services (Department) employees have access to various secure systems including the State Treasury, law enforcement records, and other information made confidential and exempt from public disclosure pursuant to Florida Statutes.

WHEREAS, Department Administrative Policy and Procedure 4-04 authorizes the Department to inspect any and all files stored on any network or local IT resource and to audit networks, traffic, and systems to ensure compliance with all Department’s procedures.

WHEREAS, Department Administrative Policy and Procedure 4-04 prohibits the installation, introduction, downloading, access or distribution of (1) Software not specifically licensed to DFS or any affiliated entities, and (2) Instant messaging Software, unless such software is approved by the Department.

WHEREAS, Department Administrative Policy and Procedure 4-04 prohibits the downloading of malicious software, either through willful intent or negligent action.

WHEREAS, Employees who access Department networks from their personal devices, make their personal devices potential targets for persons and entities looking to penetrate the Department's information technology systems.

WHEREAS, based on DeepSeek's privacy vulnerabilities the Chief Financial Officer has concluded that the risks DeepSeek presents far outweigh any benefit the application could provide to official business of the Department.

NOW THEREFORE, BE IT RESOLVED THAT I, JIMMY PATRONIS, in accordance with the authority vested in me by Article IV, Section 4 of the Florida Constitution, and Section 17.30 and 20.121(1), Florida Statutes, hereby issue the following Directive to all employees of the Department:

Section 1. Effective February 19, 2025, downloading, installing, or using the application or website interface of DeepSeek on any Department-issued device is hereby prohibited.

Section 2. Effective February 19, 2025, using the application or website interface of DeepSeek on any device that has access to the Department's network is hereby prohibited.

Section 3. Violations of this Directive may result in disciplinary action, in accordance with Rule 60L-36, Florida Administrative Code, Sections 110.604 and 110.403, Florida Statutes, as applicable, and Administrative Policy and Procedure 5-26, Standards and Procedures of Discipline for Career Service Employees.



IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Great Seal of the State of Florida to be affixed, this 20th day of February, 2025.

A handwritten signature in blue ink that reads "Jimmy Patronis".

**Chief Financial Officer
State of Florida**