Steptoe | EU AI Act Decoded

Specific Transparency Obligations for Providers and Deployers of Certain Al Systems

For a refresher on the notions of "Provider", "Deployer" and "Al systems subject to specific transparency obligations", please consult our previous EU AI Act Decoded issues on "Who will the EU AI Act apply to?' and "Classification of AI systems and GPAI Models".

Concerned AI Systems

Al systems intended to interact directly with individuals

Except Al systems authorized by law to detect, prevent, investigate, or prosecute criminal offences.

Al systems generating synthetic audio, image, video or text content (incl. GPAI systems)

Except AI systems performing an assistive function for standard editing / that do not substantially alter the input data provided / authorized by law to detect, prevent, investigate, or prosecute criminal offences.

Provider's obligations

Obligation to design and develop the AI system in such a way that the individuals are informed that they are interacting with an Al system

obvious reasonably well-informed, observant and circumspect individual.

(Art. 50)

Obligation to mark, in a machine-readable format and detectable, the AI system's outputs as artificially generated / manipulated

- This involves embedding technical solutions that enable such marking (e.g., watermarks, metadata le.g., watermarks, metadata identifications, cryptographic methods for proving provenance and authenticity of content, logging methods, fingerprints).
- These technical solutions must be effective, interoperable, robust and reliable, taking into account the specificities and limitations of various types of content, the costs of implementation and the generally acknowledged state of the art.

(Art. 50)

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Concerned AI Systems

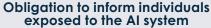
Emotion recognition system / Biometric categorization Al system

Except Al systems permitted by law to detect, prevent, or investigate criminal offences, subject to appropriate safeguards for the rights and freedoms of third parties, and in accordance with

Al system generating or manipulating image, audio or video content constituting a deep fake / that generate or manipulate text published for information purpose on matters of public interest

Except Al systems authorized by law to detect, prevent, investigate, or prosecute criminal offences / where the Algenerated content has undergone a process of human review or editorial control under the editorial responsibility of an individual.

Deployers's obligations



(Art. 50)

Obligation to disclose that the content has been artificially generated / manipulated



Where the content forms part of an evidently artistic / creative / satirical / fictional content (or similar), this disclosure can be made in a manner that does not hamper the display / enjoyment of the

(Art. 50)



Deadline to comply with these obligations: August 2, 2026

Notes:



- These obligations intend to address potential risks of impersonation or deception, as well as risks of misinformation and manipulation at scale, fraud, and consumer deception posed by certain Al systems.
- These obligations may apply in addition to the obligations imposed to high-risk AI systems.
- The information must be provided in a clear and distinguishable manner, at the latest at the time of the first interaction or exposure. It must also conform to any applicable accessibility requirements.
- The EU AI Office is encouraged to facilitate the drawing-up of codes of practice at EU level in order to ensure the effective implementation of the obligations regarding the detection and labelling of artificially generated or manipulated content.

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in linkedin.com/showcase/ai-data-digital

Contact us



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