

Stakeholder consultation on transparency requirements for certain AI systems under Article 50 AI Act

Fields marked with * are mandatory.

General information

Disclaimer: The information in this consultation is provisional information of the AI Office for the purpose of consultation and does not prejudice the final decision that the Commission may take on the final guidelines or Code of Practice on transparency requirements under Article 50 AI Act. The responses to this consultation will provide input for the preparation of a Code of Practice and guidelines on the transparency requirements for certain AI systems under Article 50 AI Act.

This consultation is targeted to stakeholders of different categories, including, but not limited to, providers and deployers of interactive and generative AI models and systems, providers and deployers of biometric categorisation and emotion recognition systems, private and public sector organisations using such interactive and generative AI systems, as well as academia and research institutions, civil society organisations, governments, supervisory authorities and the general public.

The Artificial Intelligence Act ('the AI Act'), which entered into force on 1 August 2024, creates a single market and harmonised rules for trustworthy and human-centric Artificial Intelligence (AI) in the EU [1]. It aims to promote innovation and the uptake of AI, while ensuring a high level of protection of health, safety and fundamental rights, including democracy and the rule of law.

Among various obligations, trustworthiness of AI systems is ensured by the AI Act through a set of requirements that aim to ensure transparency and to inform people when they are interacting with or being exposed to certain AI systems and their outputs. These transparency requirements are set out in Article 50 AI Act and will be applicable from 2 August 2026.

These transparency requirements aim to enable natural persons to recognise interaction with and content generated or manipulated by AI systems, thus reducing the risks of impersonation, deception or anthropomorphisation and fostering trust and integrity in the information ecosystem.

First, Article 50(1) AI Act obliges providers of AI systems that directly interact with natural persons to ensure that those persons are informed that they are interacting with an AI system and not a human, unless this is

obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect, taking into account the circumstances and the context of use. Second, Article 50(2) AI Act aims to facilitate trustworthy detection and identification of AI-generated or manipulated content by requiring providers to mark such content in a machine-readable manner and enabling related detection mechanisms. Third, Article 50(3) AI Act requires deployers of emotion recognition or biometric categorisation AI systems to ensure that individuals exposed to these systems are informed about their operation. Fourth, Article 50(4) AI Act requires deployers of AI systems generating or manipulating deep fake content, or AI-generated or manipulated text publications intended to inform the public on matters of public interest to inform about the artificially generated or manipulated origin of the content, except in defined cases. Fifth, Article 50(5) AI Act imposes horizontal requirements on the above-mentioned transparency measures to ensure that the required information is provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure, while respecting applicable accessibility requirements. Finally, Article 50(6) AI Act addresses the interaction between Article 50 and requirements applicable to high-risk AI systems under the AI Act and with other transparency obligations laid down in Union or national law for deployers of AI systems.

Pursuant to Article 96(1)(d) AI Act, the Commission shall issue guidelines on the practical implementation of transparency obligations laid down in Article 50 AI Act. Pursuant to Article 50(7) AI Act, the AI Office will encourage and facilitate the drawing up of codes of practice to facilitate the effective implementation of the obligations regarding the detection and labelling of artificially generated or manipulated content.

The purpose of the present targeted stakeholder consultation is to collect input from a wide range of stakeholders to inform the Commission guidelines and a Code of Practice on the detection and labelling of artificially generated or manipulated content. These topics will relate to specific practical examples on how the transparency requirements can be implemented, including issues that may require clarification whether they fall under the scope of Article 50 AI Act and under what conditions, information on state-of-the-art transparency and disclosure practices or other conceptual clarifications.

Since not all questions may be relevant for all stakeholders, respondents may reply only to the section(s) and the questions they deem relevant. Respondents are encouraged to provide specific, concise and concrete **explanations and concrete use cases**.

The consultation is available in **English only** and will be open for **5 weeks starting on 4 September until 9 October 2025, 23:59 CET**.

[1] Article 1(1) AI Act.

The questionnaire for this consultation is structured along 5 sections with several questions.

Respondents may choose to provide answers only to some sections or only to some questions to which they wish to reply within the sections.

The sections of the survey are as follows:

Section 1. Questions in relation to Article 50(1) AI Act

This section includes questions on the concept of interactive AI systems, the applicable exception in case the direct interaction with persons could be considered obvious, their use for law enforcement activities and practical ways to design the systems in a way that individuals are notified about the interaction with AI systems.

Section 2. Questions in relation to Article 50(2) AI Act

This section includes questions related to the concept of synthetic content generating or manipulating AI systems, the applicable exceptions to marking AI-generated or manipulated content, their use for law enforcement activities, existing state-of-the-art technical solutions for marking and detecting AI-generated or manipulated content and the criteria for the assessment of marking techniques.

Section 3. Questions in relation to Article 50(3) AI Act.

This section includes questions on the concept of exposure to emotion recognition and biometric categorisation systems, their use for law enforcement activities and practical ways to inform natural persons of the operation of the system.

Section 4. Questions in relation to Article 50(4) AI Act

First, this section includes questions related to the concept of deep fake generating AI systems, the concept of evidently artistic, creative, satirical, fictional or analogous works or programmes, the system's use for law enforcement activities and best practices for disclosing the artificially generated or manipulated origin of deep fakes (including when part of artistic or creative works). Second, the section includes questions related to the concept of AI systems generating or manipulating text published for the purpose of informing the public on matters of public interest, the applicable exception in case the text is subject to human review or editorial control and a natural or legal person holds editorial responsibility, the exempted use for law enforcement activities and best practices for informing the public about the artificially generated or manipulated origin of such content.

Section 5. Other horizontal questions in relation to the implementation of Article 50 AI Act

This section covers a set of questions that relate to horizontal issues regarding Article 50 AI Act. First, it addresses the requirements from Article 50 (5) AI Act which apply horizontally when providing the information as required by paragraphs 1-4 of Article 50. Second, the section addresses Article 50(6) and the interplay between AI Act's requirements from Article 50(1)-(5) and other transparency obligations of the AI Act or other Union or national legislation. Finally, it also asks for recommendations and good practices for the Code of Practice.

All contributions to this consultation may be made publicly available. Therefore, please do not share

any personal or confidential information in your contribution (Section 1-5). It is your responsibility to avoid including personal data in your contribution itself (any reference in your contribution itself that would reveal your identity, including together with the organisation you represent).

The AI Office will publish a summary of the results of the consultation. Results will be based on aggregated data and respondents will not be directly quoted in the summary.

Introductory section - Information about the respondent

* First name

Danai Skevi,

* Surname

Tania Skrapaliori

* Email address

info@homodigitalis.gr

* Do you represent an organisation (e.g., think tank or civil society/consumer organisation, provider or deployer of an AI system) or act in your personal capacity (e.g., independent expert or from a provider/deployer)?

- ☒ Organisation
- ☐ In a personal capacity

* Name of the organisation

Homo Digitalis

* Is your organisation headquartered in the EU?

- ☒ Yes
- ☐ No

* Select the EU member state where the organisation's headquarter is located

- ☒ AT - Austria
- ☐ BE - Belgium
- ☐ BG - Bulgaria
- ☐

- HR - Croatia
- ☐ CY - Cyprus
- ☐ CZ - Czechia
- ☐ DK - Denmark
- ☐ EE - Estonia
- ☐ FI - Finland
- ☐ FR - France
- ☐ DE - Germany
- ☒ EL - Greece
- ☐ HU - Hungary
- ☐ IE - Ireland
- ☐ IT - Italy
- ☐ LV - Latvia
- ☐ LT - Lithuania
- ☐ LU - Luxembourg
- ☐ MT - Malta
- ☐ NL - Netherlands
- ☐ PL - Poland
- ☐ PT - Portugal
- ☐ RO - Romania
- ☐ SK - Slovak Republic
- ☐ SI - Slovenia
- ☐ ES - Spain
- ☐ SE - Sweden

* Select the size of the organisation

- ☒ Micro (0-9 employees)
- ☐ Small (10-49 employees)
- ☐ Medium (50-249 employees)
- ☐ Small Mid-Cap (250-499 employees)
- ☐ Large (500 or more employees)
- ☐ Other (e.g. multiple organisations)

* Which stakeholder category would you consider yourself in? If more than one category is applicable, please select the category that is best applicable in your situation / from the capacity you are responding.

- ☐ Deployer of an AI system
- ☐ Provider of a generative AI model
- ☐ Provider of an AI system
- ☐ Provider of transparency techniques
- ☐ Other operators (e.g. distributor, importer)
- ☐ Persons interacting with or exposed to AI systems and their outputs
- ☐ Rightholders
- ☐ Business association
- ☐ Academia
- ☐ Other independent expert or organisation with relevant expertise
- ☒ Civil society organisation
- ☐ Supervisory authority
- ☐ Other

* In which sector do you operate?

- | | | |
|--|---|---|
| ☐ Information technology | ☐ Media | ☐ Energy |
| ☐ Public administration | ☐ Healthcare | ☐ Transport |
| ☐ Law enforcement | ☐ Employment | ☐ Telecommunications |
| ☐ Justice sector | ☐ Education and training | ☐ Retail |
| ☐ Legal services sector | ☐ Consumer goods or services | ☐ E-commerce |
| ☒ Civil society and non-profit organisations | ☐ Business services | ☐ Advertising |
| ☐ Security | ☐ Banking and finance | ☐ Other |
| ☐ Cultural and creative sector | ☐ Manufacturing | |

* Please briefly describe the activities of your organisation or yourself.

1300 character(s) maximum

Homo Digitalis focuses on promoting and defending human rights in the modern digital era in Greece. Through the three pillars of our actions, namely, a) raising awareness, b) shaping policy decisions, and c) strategic legal interventions, we aim to strengthen the protection of fundamental rights and freedoms for everyone, both in the digital and physical worlds, when new technologies, including artificial intelligence applications, are used by private or public entities.

* Do you agree that we may publish your identity together with your contribution in the instance that all contributions are made publicly available?

If you act in your personal capacity: All contributions to this consultation may be made publicly available. You can choose whether you would like your details to be made public or to remain anonymous. The respondent category that you selected for this consultation, your answer regarding residence, and your contribution may be published as received. Should you choose to remain anonymous, your name will not be published. Please do not include any personal data in the contribution itself.

If you represent one or more organisations: All contributions to this consultation may be made publicly available. You can choose whether you would like respondent details to be made public or to remain anonymous. Only the following organisation details may be published: The respondent category that you selected for this consultation, the name of the organisation on whose behalf you reply as well as its size, its presence in or outside the EU and your contribution as received. Should you choose to remain anonymous, your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- ☒ Yes
☐ No

* Do you agree that we may contact you in the event of follow-up questions or if we want to learn more about your responses?

- ☒ Yes
☐ No

For information on how we process your personal data, please see our privacy statement.

[Privacy_statement_consultation_transparency.pdf](#)

* **In which part(s) of the public consultation are you interested to contribute to?** Multiple answers are possible. Please note that selecting a particular option will direct you to a set of questions specifically related to subject specified. If you do not select a specific option, you will be unable to respond to related questions.

- ☒ Section 1 - Questions in relation to Article 50(1) AI Act
☐ Section 2 - Questions in relation to Article 50(2) AI Act

- ☐ Section 3 - Questions in relation to Article 50(3) AI Act
- ☒ Section 4 - Questions in relation to Article 50(4) AI Act
- ☒ Section 5 - Other horizontal questions in relation to the implementation of Article 50 AI Act.

Section 1. Questions in relation to Article 50(1) AI Act

Article 50(1) AI Act targets providers of interactive AI systems, notably systems that are intended to interact directly with natural persons. Providers should ensure that such systems are designed and developed in such a way that the natural persons concerned are informed that they are interacting with an AI system.

Recital 132 AI Act clarifies that when implementing the transparency obligation for interactive AI systems, the characteristics of natural persons belonging to vulnerable groups due to their age or disability should be taken into account to the extent the AI system is intended to interact with those groups. Article 50(5) AI Act furthermore requires that the information shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.

Article 50(1) AI Act exempts providers from this obligation if the interaction with the AI system can be considered obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect, taking into account the circumstances and the context of use.

Question 1. Please provide practical examples of AI systems that directly interact with natural persons, as well as examples for which there is doubt and you would seek clarification or consider out of scope.

For each AI system, determine whether the interaction with the AI system can be considered obvious from the point of view of a natural person who is reasonably well-informed, observant and circumspect. Consider in your answer how this interaction may be affected by the characteristics of natural persons belonging to vulnerable groups due to their age or disability.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Name and description of the system	Is the AI system intended to interact directly with natural persons?	Motivate your answer	Specify if the interaction with the AI system can be considered obvious as specified in Article 50 (1)?	Motivate your answer and provide practical example(s) of such circumstances and context of use
1	Name/description myAlgov - Greek government's chatbot	Select Yes	Explain <i>500 character(s) maximum</i> Government: This is a publicly developed conversational system that gives citizens basic information about procedures, services and issues related to the Greek government, such as permits, subsidies, prescriptions, employment programs and other related issues.	Select Yes	Explain <i>500 character(s) maximum</i> The interaction is obvious: (1) the name of the system contains the “AI” initials; (2) there is clear information that it is a trial – beta version; (3) there is clear information that the system is an AI application; (4) there is clear indication that users do not communicate with a human but with an AI application; (5) there is reference to the usage Policy for more information; (6) user's approval is necessary to continue the conversation.
2	Name/description Phone banking - Alpha Bank	Select Yes	Explain <i>500 character(s) maximum</i> Banking: This private phone banking system is used for the initial screening of customer requests, redirecting them to a human bank	Select	Explain <i>500 character(s) maximum</i> Although there is no information that persons communicate with a digital assistant the interaction is obvious from the context: (1) as it has been a widely known business practice to communicate with an automated message that only

			agent. All of Greece's major systemic banks use the same phone banking system.	Depends on the circumstances and context	receives and further transmits the relevant request; and (2) as it has been a widely known business practice that the user is connected with a human representative. An accessibility phone menu should be created to provide special care for the elderly.
3	<i>Name/description</i> Eva - Eurobank’s chatbot	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> Banking: This is a private bank’s conversational chatbot that answers questions regarding the bank’s products and services.	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> The interaction is obvious: (1) it is clearly stated that it is the bank's digital assistant; (2) further reference is made to the Usage Policy; and (3) user approval of the Usage Policy is required to continue the conversation. All this information is made available at the first user interaction, via a conversational menu.
4	<i>Name/description</i> Sophia – National Bank’s of Greece chatbot	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> Banking: This is a private bank’s conversational chatbot that answers questions regarding the bank’s products and services	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> The interaction is obvious: (1) it is clearly stated that it is the bank's digital assistant; (2) further reference is made to the Terms of Use; and (3) user approval of the Terms of Use is required to continue the conversation. All this information is made available at the first user interaction, via a conversational menu.
5	<i>Name/description</i> Virtual assistant with generative AI - Zara’s chatbot	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> Retail: This is a conversational chatbot that answers questions regarding the orders, returns, payments or other inquiries about the brand.	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> The interaction is obvious: (1) the name of the system is descriptive of the nature of the chatbot “Virtual assistant with generative AI”; (2) there is a notice that more information about the interaction with generative AI can be given.
6	<i>Name/description</i> Clio - Cosmote’s digital tour guide	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> Culture: This is a conversational chatbot operating as a virtual tour guide of archaeological sites, an idea developed by Cosmote telecommunications company.	<i>Select</i> Yes	<i>Explain</i> <i>500 character(s) maximum</i> The interaction is obvious: (1) the provision of a virtual tour guide with the help of AI is mentioned when activating the mobile app for the first time and at later stages; (2) an avatar of the digital tour guide is used; (3) it is mentioned that the user can pose questions to the digital tour guide.
		<i>Select</i> ☐		<i>Select</i> ☐ Yes ☐ No ☐	

7	Name/description	Yes ☐ Not sure ☐ No	Explain 500 character(s) maximum	Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
8	Name/description	Select ☐ Yes ☐ Not sure ☐ No	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
9	Name/description	Select ☐ Yes ☐ Not sure ☐ No	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
				Select	

10	<i>Name/description</i>	<i>Select</i> ☐ Yes ☐ Not sure ☐ No	<i>Explain</i> <i>500 character(s) maximum</i>	☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	<i>Explain</i> <i>500 character(s) maximum</i>
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If you have more examples, please enter them in the section below, following the structure of question 1.

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Furthermore, the transparency obligation under Article 50(1) AI Act does not apply if the interactive AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences, subject to appropriate safeguards for the rights and freedoms of third parties unless those systems are available for the public to report a criminal offence.

Question 2. Please provide practical examples of AI systems that directly interact with natural persons and that can be authorised by law to detect, prevent, investigate, or prosecute criminal offences. For each system, provide the law that can authorise the use and describe appropriate safeguards for the rights and freedoms of third parties.

If you are aware of any AI systems available for the public to report criminal offences, please include them in your response.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Name and description of the system	Provide the law that can authorise the use to detect, prevent, investigate, or prosecute criminal offences and describe the appropriate safeguards	Is the AI system available for the public to report a criminal offence?	Motivate your answer
1	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
2	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
3	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
			Select	

4	Name/description	Describe 500 character(s) maximum	☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
5	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
6	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
7	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
8	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum
9	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No	Explain

			☐ Not sure	500 character(s) maximum
10	Name/description	Describe 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum

If you have more examples, please enter them in the section below, following the structure of question 2.

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Question 3. If you are aware of any examples of notification techniques that can be employed with interactive AI systems, including embedded in their design, to duly inform natural persons that they are interacting with an AI system, please provide them in your response.

For each notification technique, determine whether the type and the content of the technique used for notifying a natural person is appropriate, including considering the characteristics of natural persons belonging to vulnerable groups due to their age or disability, the need for a clearly distinguishable and accessible manner and the timing of the notification.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Description of the notification technique	Determine whether the type and the content of the technique used for notifying a natural person is appropriate	Motivate your answer and, where available, provide practical examples with links and further information
1	<i>Describe</i> An introductory message indicating the “use” of an interactive AI system by the provider.	<i>Select</i> Appropriate	<i>Explain</i> <i>500 character(s) maximum</i> It is important to have an introductory message informing users about the “use” of the interactive AI system at the first point of interaction. Specific provisions should be made for creating a 'special menu' (e.g. an audio message or large text) that is suitable for vulnerable groups, such as those with visual impairments. Example: Hello! I am a digital assistant/interactive AI system.
2	<i>Describe</i> An introductory message indicating the “type of interaction” between an AI	<i>Select</i>	<i>Explain</i> <i>500 character(s) maximum</i> It is important to have an introductory message informing users about the “type and limits of interaction” of natural persons with the AI system. Specific provisions should be made for creating a

	system and natural persons.	Appropriate	'special menu' (e.g. an audio message or large text) that is suitable for vulnerable groups, such as those with visual impairments. Example: You are now chatting with/speaking to a virtual assistant that answers questions about the products of the company.
3	Describe Reference of the anticipated tasks performed by interactive AI systems at first user interaction.	Select Appropriate	Explain <i>500 character(s) maximum</i> It is important to clarify the typical tasks of interactive AI systems, i.e. routine and anticipated tasks. Example: Please note that the digital assistant provides general information about the company's services. For more information about its capabilities you can click here.
4	Describe Use of visual signs - e.g. AI emoticon, avatar other icons during the interaction.	Select Appropriate	Explain <i>500 character(s) maximum</i> It is important at first interaction to have a relevant icon, badge or other symbol indicating the use of AI. A universally accepted emoticon could be created for use whenever interactive AI systems are employed. Example: 'AI', 'genAI', Virtual Assistant', 'powered by AI', or a visual badge depicting a non-human agent.
5	Describe Use persistent labelling during the interaction.	Select Appropriate	Explain <i>500 character(s) maximum</i> It is important to place persistent labelling of the AI system throughout the interaction to remind the user that they interact with AI, especially if the system provided sophisticated answers, engages in emotional conversations or the conversation is goes on for a long time. An 'AI Badge' of small size could be placed next to each answer – this is particularly important if it interacts with minors and other vulnerable persons.
6	Describe Use labelling when switching from agent to human interaction, and ensure human communication is available.	Select Appropriate	Explain <i>500 character(s) maximum</i> It is important to make it clear when the interaction changes from the interactive AI system to a human agent, and to ensure that a human agent is always available and easily accessible – this is particularly important for vulnerable people. Example: You will be now connected with a human / If you want to connect with a human dial the X number, send a message to X address.
		Select	

7	<i>Describe</i>	☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ Depends on the circumstances and context	<i>Explain</i> 500 character(s) maximum
8	<i>Describe</i>	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ Depends on the circumstances and context	<i>Explain</i> 500 character(s) maximum
9	<i>Describe</i>	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐	<i>Explain</i>

		Depends on the circumstances and context	500 character(s) maximum
10	<i>Describe</i>	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ Depends on the circumstances and context	<i>Explain</i> 500 character(s) maximum

If you have more examples, please enter them in the section below, following the structure of question 3.

*Full answer of Question 4 below: (1) It should be made clear when the transparency obligation extends to the 'deployer', as it is extremely common for end users (most likely consumers) to interact with AI systems used by deployers; (2) It would be good practice for the transparency obligation to also apply to 'indirect' interaction with AI systems where the human has only a superficial and non-essential role. This is because it is important for those involved to know who is truly initiating the interaction; (3) When setting the appropriate transparency threshold, it is important to ensure that users are not burdened by information overload; (4) Although the transparency obligations of Art. 50(1) do not differentiate between industries, the 'information to natural persons' threshold should be higher for high-risk AI systems due to the consequences for the rights of natural persons in the event of a breach.

Question 4. Are there aspects related to the scope or practical implementation of the transparency obligation for interactive AI systems under Article 50(1) for which you would seek further clarification?

- ☒ Yes
- ☐ No

Please, specify.

500 character(s) maximum

1) It should be made clear when the transparency obligation extends to the 'deployer', as it is extremely common for end users (most likely consumers) to interact with AI systems used by deployers. 2) Although the transparency obligations of Art. 50(1) do not differentiate between industries, the 'information to natural persons' threshold should be higher for high-risk AI systems due to the consequences for rights of natural persons in the event of a breach. Please read our full answer in Q3 above*

Section 4 – Questions in relation to Article 50(4) AI Act

Article 50(4), subparagraph 1, AI Act requires deployers of AI systems generating or manipulating image, audio or video content constituting a deep fake to disclose that the content has been artificially generated or manipulated. The definition of a deep fake is provided in Article 3(60) AI Act, which defines 'deep fakes' as AI-generated or manipulated image, audio, or video content that resembles existing persons, objects, places, entities, or events and would falsely appear to a person as authentic or truthful.

If the deep fake content forms part of an evidently artistic, creative, satirical, fictional or analogous work or programme, the transparency requirement is limited to the disclosure of the existence of such generated or manipulated content in an appropriate manner that does not hamper the display or enjoyment of the work. The transparency obligation in Article 50(4), subparagraph 1, does not apply if the AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences.

Question 13. Please provide practical examples of generative AI systems that produce ‘deep fake’ AI-generated or manipulated image, audio, or video content that resembles existing persons, objects, places, entities, or events and would falsely appear to a person as authentic or truthful.

If you are aware of any AI systems for which the deep fake content may be considered to form part of an evidently artistic, creative, satirical, fictional or analogous work or programme, please include them in your response.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Name and description of the system	Is the AI system generating or manipulating image, audio or video content constituting a deep fake?	Motivate your answer	Can the deep fake content form part of an evidently artistic, creative, satirical, fictional or analogous work or programme?	Motivate your answer and provide practical example(s)
1	Name/description	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Explain</i> <i>500 character(s) maximum</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	<i>Explain</i> <i>500 character(s) maximum</i>
2	Name/description	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Explain</i> <i>500 character(s) maximum</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	<i>Explain</i> <i>500 character(s) maximum</i>
		<i>Select</i> ☐	<i>Explain</i>	<i>Select</i> ☐ Yes	

3	Name/description	Yes ☐ No ☐ Not sure	500 character(s) maximum	☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
4	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
5	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
6	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
7	Name/description	Select ☐ Yes ☐ No ☐	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum

		Not sure		☐ Depends on the circumstances and context	
8	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
9	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum

If you have more examples, please enter them in the section below, following the structure of question 13.

Question 14. Please provide practical examples of AI-generated or manipulated content for which you would seek clarification regarding its classification as a ‘deep fake’.

400 character(s) maximum

Question 15. If you are aware of any generative AI systems producing deep fakes that can be authorised by law to detect, prevent, investigate or prosecute criminal offences, please provide practical examples thereof in your response. For each of these systems, provide the law that can authorise the use and if it includes any appropriate safeguards for the rights and freedoms of third parties.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Name and description of the system	Is the AI system generating or manipulating image, audio or video content constituting a deep fake and can the system be authorised by law to detect, prevent, investigate, or prosecute criminal offences?	If yes, describe the law that can authorise the use of the AI system for law enforcement purposes and if it includes any appropriate safeguards
1	<i>Name/description</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Describe</i> 500 character(s) maximum
2	<i>Name/description</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Describe</i> 500 character(s) maximum
3	<i>Name/description</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Describe</i> 500 character(s) maximum

4	<i>Name/description</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Describe</i> <i>500 character(s) maximum</i>
5	<i>Name/description</i>	<i>Select</i> ☐ Yes ☐ No ☐ Not sure	<i>Describe</i> <i>500 character(s) maximum</i>

If you have more examples, please enter them in the section below, following the structure of question 15.

Recital 134 clarifies that deployers of AI systems generating deep fake content should clearly and distinguishably disclose that it has been artificially created or manipulated by labelling the output accordingly and disclosing its artificial origin. Regarding deep fake content that is part of evidently creative, satirical, artistic, fictional or analogous works or programmes, that recital clarifies that disclosure of the existence of such generated or manipulated deep fake content should occur in an appropriate manner that does not hamper the display or enjoyment of the work, including its normal exploitation and use, while maintaining the utility and quality of the work.

Article 50(5) AI Act furthermore requires that the information shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.

Question 16. If you are aware of any examples of disclosure practices that can be employed with deep fake content to duly disclose the artificially generated or manipulated origin of such content to natural persons exposed thereto, please provide them in your response.

For each disclosure practice, determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons about the artificially generated or manipulated origin of the content and the timing of the notification.

In cases where the disclosure practice is used on deep fake content that forms part of an evidently creative, satirical, artistic, fictional or analogous work or programme, determine whether the disclosure is done in an appropriate manner that does not hamper the display or enjoyment of the work.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Description of the disclosure practice	Specify to which type of deep fake it applies	Determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons	Motivate your answer and, where available, provide practical examples with links and further information	For deep fake content part of evidently creative satirical, artistic, fictional or analogous works, determine whether the disclosure does not hamper the display or enjoyment of the work	Motivate your answer and provide practical example(s)
1	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> <i>500 character(s) maximum</i>	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	<i>500 character(s) maximum</i>
		<i>Select</i> ☐ Audio ☐	<i>Select</i> ☐ Appropriate		<i>Select</i> ☐ Hampers the display or enjoyment ☐	

2	<i>Describe</i>	Image ☐ Video ☐ Not sure	☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
3	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
4	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
5	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
6	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure	500 character(s) maximum

		☐ Not sure	Not sure		☐ Not applicable	
7	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
8	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
9	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum
10	<i>Describe</i>	<i>Select</i> ☐ Audio ☐ Image ☐ Video ☐ Not sure	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure	<i>Explain</i> 500 character(s) maximum	<i>Select</i> ☐ Hampers the display or enjoyment ☐ Does not hamper the display or enjoyment ☐ Not sure ☐ Not applicable	500 character(s) maximum

If you have more examples, please enter them in the section below, following the structure of question 16.

Article 50(4), subparagraph 2, AI Act requires deployers of AI systems generating or manipulating text published with the purpose of informing the public on matters of public interest to disclose that the content has been artificially generated or manipulated.

This obligation does not apply if the AI system is authorised by law to detect, prevent, investigate, or prosecute criminal offences or where the AI-generated content has undergone a process of human review or editorial control and a natural or legal person holds editorial responsibility for the publication of the content.

Question 17. Please provide practical examples of AI systems generating or manipulating text published with the purpose of informing the public on matters of public interest, including by providing examples of such publications.

If you are aware of any AI systems that may fall under one or more of the exceptions, such as AI systems for which the AI-generated or -manipulated text has undergone human review or editorial control and where a natural or legal person holds editorial responsibility for the publication of the content, or the use can be authorised by law to detect, prevent, investigate, or prosecute criminal offences, please include them in your response. If applicable, provide the law that can authorise the use for law enforcement purposes.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Name and description of the system	Is the AI system generating or manipulating text published with the purpose of informing the public on matters of public interest?	Motivate your answer, including as regards the type of the publication	Does the AI system fall within one or more of the exceptions of Article 50(4) subparagraph 2?	Motivate your answer and provide practical example(s). For the law enforcement exemptions, provide the law that can authorise the use for law enforcement purposes and if it includes any appropriate safeguards
1	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure	Explain 500 character(s) maximum

				☐ Depends on the circumstances and context	
2	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
3	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐	Explain 500 character(s) maximum

				No ☐ Not sure ☐ Depends on the circumstances and context	
4	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
		Select ☐		Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐	

5	Name/description	Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
6	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
				Select ☐ Yes – human review or editorial control is guaranteed, and there is a	

7	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐ Depends on the circumstances and context
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9	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐ Depends on the circumstances and context	Explain 500 character(s) maximum
10	Name/description	Select ☐ Yes ☐ No ☐ Not sure	Explain 500 character(s) maximum	Select ☐ Yes – human review or editorial control is guaranteed, and there is a person holding editorial responsibility for the publication ☐ Yes – the system is authorised by law to detect, prevent, investigate, or prosecute criminal offences ☐ No ☐ Not sure ☐	Explain 500 character(s) maximum

			Depends on the circumstances and context	
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If you have more examples, please enter them in the section below, following the structure of question 17.

Question 18. Please provide practical examples of AI-generated or manipulated textual content for which you would seek clarification regarding whether or not such content is published with the purpose of informing the public about matters of public interest, or whether or not such content has undergone human review or editorial control.

400 character(s) maximum

Question 19. If you are aware of any examples of disclosure practices that can be employed for AI-generated or manipulated text published with the purpose of informing the public on matters of public interest to duly disclose the artificially generated or manipulated origin of the publication to natural persons exposed thereto, please provide them in your response.

For each disclosure practice, determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons about the artificially generated or manipulated origin of the publication and the timing of the notification.

If needed, please use the horizontal scroll bar located at the bottom of the table in order to view all the columns.

	Description of the disclosure practice	Determine whether the type and the content of the disclosure practice is appropriate for clearly, distinguishably and accessibly informing natural persons	Motivate your answer and, where available, provide practical examples with links and further information
1	Description	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	<i>Explain</i> 500 character(s) maximum
2	Description	<i>Select</i> ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	<i>Explain</i> 500 character(s) maximum

3	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
4	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
5	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
6	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
		Select ☐ Appropriate	

7	Description	☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
8	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
9	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum
10	Description	Select ☐ Appropriate ☐ Not appropriate ☐ Not sure ☐ None	Explain 500 character(s) maximum

If you have more examples, please enter them in the section below, following the structure of question 19.

*Full answer to Question 20 below 1. Delimitation of "matters of public interest" The term "matters of public interest" in Article 50(4) lacks normative precision, creating a significant risk of both overbreadth and underbreadth. Especially very narrow interpretation—confined to electoral or formal governmental content—would exclude manipulative AI-generated material addressing critical issues such as public health, environmental policy, corporate accountability, or institutional integrity, even where such content demonstrably influences public opinion or civic decision-making. This would undermine the regulatory objective of ensuring transparency in AI-generated content capable of shaping public discourse. The Commission should adopt interpretive guidance anchoring "public interest" to the established jurisprudence of the ECtHR and CJEU. This case law recognizes a participatory, democratic conception of public debate encompassing matters affecting democratic processes, governmental transparency, public health and safety, environmental protection, and issues subject to legitimate public scrutiny. The guidance should include: (a) illustrative, non-exhaustive lists of covered subject matter (elections, regulatory policy, public health emergencies, climate change, institutional accountability, corporate wrongdoing affecting public welfare); (b) a functional test whereby the obligation applies where AI-generated content is likely to influence public opinion or civic decision-making among a reasonably broad audience—a "material risk of influence" criterion focusing regulatory burden on content with genuine societal impact; and (c) clarification on edge cases, specifying that the duty also attaches when deployers present AI outputs as authoritative informational content (news, policy briefs, expert analyses) or when outputs are materially indistinguishable from human-authored public discourse. This would ensure comprehensive coverage of AI content capable of influencing democratic participation. 2. The "existing" referent requirement in Article 3(61) Article 3(61) defines deepfakes as content "appreciably resembling existing persons, objects, places or other entities or events." This creates a significant regulatory gap: highly realistic, fully synthetic content that does not mimic any identifiable real-world referent may fall outside the literal scope, despite posing equivalent deception risks. Examples include AI-generated videos of fictional officials making policy statements, fabricated images of nonexistent disasters, or counterfeit news photographs documenting invented incidents. Such content can exert identical detrimental effects on public trust and discourse integrity as traditional deepfakes. The Commission should clarify or amend Article 3(61) to explicitly encompass "realistically presented synthetic content" (or alternatively: "synthetic audiovisual material presented as authentic" or "verisimilar AI-generated content")—that is, any AI-generated or AI-manipulated content that is: (a) presented in a realistic manner; and (b) likely to be perceived as authentic by a reasonably attentive audience, regardless of correspondence to identifiable real-world referents. This would preserve legal certainty while closing the synthetic realism loophole.

Question 20. Are there any other aspects related to the scope or the practical implementation of the transparency requirement for deployers of AI systems that generate deep fakes and text publications on matters of public interest under Article 50(4) for which you would seek clarification?

- ☐ No
- ☒ Yes

Please, specify.

500 character(s) maximum

Please, read our detailed input in question 19 above*

Section 5. Horizontal questions in relation to the implementation of Article 50 AI Act

Article 50(5) AI Act requires that the information to be provided under the various transparency requirements from Article 50 shall be provided to the natural persons concerned in a clear and distinguishable manner at the latest at the time of the first interaction or exposure. In addition, such information shall conform to the applicable accessibility requirements. Regarding the latter, recital 132 confirms that such information and notifications should be provided in accessible formats for persons with disabilities.

Question 21. Are there aspects related to the AI Act's horizontal requirements in Article 50(5), including their interplay with the requirements in Article 50(1)–(4), for which you would seek clarification?

- ☐ No
☒ Yes

Please, specify.

500 character(s) maximum

It should be made clear that Art. 50(5) applies to 'how' transparency requirements must be fulfilled (procedural obligations) whereas Art. 50(1-4) refer to 'when' transparency requirements should or should not apply (substantive obligations). It should be clarified how exceptions relating to the detection prevention investigation or prosecution of criminal acts interact with accessibility requirements for disabled people. Should officers provide accessible notices for people with disabilities?

Article 50(6) AI Act states that paragraphs 1 to 4 of Article 50 shall not affect the requirements and obligations set out in Chapter III of the AI Act (i.e. the chapter containing the rules applicable to high-risk AI systems) and shall be without prejudice to other transparency obligations for deployers of AI systems under other Union or national law.

Question 22. Are there any further aspects related to the transparency obligations under Article 50(1)–(5) for which you would seek clarification regarding their interplay with other obligations in the AI Act?

- ☐ No
☒ Yes

Please, specify which aspects require clarification and point to specific provisions in the AI Act.

500 character(s) maximum

1) The transparency requirements for high-risk AI systems (Art. 13-14) should benefit not only deployers but also natural persons (Art. 50) 2) The accessibility requirements (Art. 50 (5)) should be treated as a design obligation for high-risk AI systems 3) it should be clarified how the exceptions for law enforcement (Art. 50(1-4)) align with the increased transparency and other requirements for high-risk systems (chapter III).

Question 23. Are there any further aspects related to the transparency obligations under Article 50(1)-(5) for which you would seek clarification regarding their interplay with obligations in other Union or national legislation (e.g. data protection regulation such as Regulations (EU) 2016/679 and (EU) 2018/1725 and Directive (EU) 2016/680, Regulation (EU) 2024/900 on the transparency and targeting of political advertising or Regulation (EU) 2022/2065 on a Single Market For Digital Services)?

- ☐ No
- ☒ Yes

Please, specify which specific aspects require clarification and point to specific provisions in Union or national legislation.

500 character(s) maximum

If the AI system processes personal data certain information must be provided to data subjects (13-14 GDPR). In this case it should be clarified how this right will be reconciled with the exemptions for law enforcement (Art. 50(1)(3) AI Act). Alignment is needed between the right of data subjects not to be subject to automated decision-making, unless certain exceptions apply (22 GDPR) and the possibility of not providing information to natural persons for reasons relating to crime (Art 50(1)(3))

Question 24. Are there any recommendations or good practices you would like to share as input for the Code of Practice to operationalise the implementation of the transparency obligations regarding interactive and generative AI systems?

- ☐ No
- ☒ Yes

Please, specify.

750 character(s) maximum

(1) The use of practical examples and use cases is recommended to explain abstract notions, particularly the following: 'obvious interaction with AI systems', 'circumstances and the context of use', 'appropriate safeguards for the rights and freedoms of third parties', 'assistive function for standard editing', 'do not substantially alter the input data', 'semantics thereof' (Art 50(1-3)); (2) The distinction between providers and deployers should not affect transparency towards natural persons under Art. 50. Therefore, it should be clear that transparency requirements do not change when natural persons interact with AI systems or synthetic content made available by deployers or vice versa.

Contact

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