

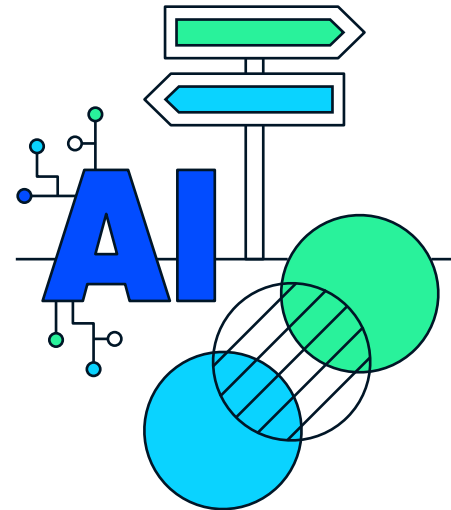
Article 50 AI Act



transparency guide

Under the AI Act, providers and deployers of AI systems may be subject to additional transparency requirements for certain AI systems. In line with the European Commission's recent guidelines on this matter ([Guidelines on transparency obligations for providers and deployers of AI systems | Shaping Europe's digital future](#)), the Knowledge Centre on Data & Society has developed this guide on the Article 50 AI Act transparency requirements.

This guide enables organisations to determine which AI systems are subject to which requirements, based on their respective status as providers and/or deployers.



Checkpoint 1

Key points to consider

Article 50 AI Act applies from **2 August 2026** onwards. However, if you provide an AI system covered by Article 50(2) AI Act that was placed on the market **before that date**, you have until **2 December 2026** to comply. The specific AI Act timeline can be found [here](#).

The obligations in Article 50 AI Act are not mutually exclusive and may apply cumulatively. You may act as both provider and deployer of a particular AI system, and the same AI system may trigger more than one transparency obligation. **Check therefore each obligation separately** to see whether it applies to your situation ('Checkpoint 2.1 and 2.2').

First verify whether your AI system falls within the scope of the AI Act and is not covered by an exemption. **Use our 'AI Act in 6 steps' tool for this initial assessment.**

Checkpoint 2.1

The provider track

PROVIDER

You are a provider because you 1) develop AI systems or GPAI models or have them developed and 2) place them on the Union market or put them into service under your own name or trademark, whether for payment or free of charge.

Interactive AI system

Article 50(1) AI Act

Step 1 – Does this obligation apply to you?

Is the AI system **intended to interact directly with natural persons**?

For this question, **all four elements** must be present:

1. It is an **AI system**;
2. It is **intended to interact** with natural persons through a two-way exchange that is genuinely conversational or responsive;
3. The **interaction is direct**, usually meaning (near) real-time interaction without a human intermediary;
4. The interaction is **with natural persons**.

Yes

Step 2 – Does an exception apply?

Check whether one of these exceptions apply:

1. The **AI nature of the interaction is obvious** to a reasonably well-informed, observant and circumspect natural person, considering the context of use and the target audience's diversity and digital/AI literacy;
2. The AI system is **authorised by law to detect, prevent, investigate or prosecute criminal offences**, unless it is publicly available to individuals for reporting criminal offences.

Yes

No

You are exempt from the obligation.

Step 3 – What do you need to do?

You are responsible for ensuring that the AI system is **designed and developed in such a way that natural persons are clearly informed that they are interacting with an AI system**.

The AI Act does not require a specific disclosure technique, but the disclosure must make it clear that the interaction is with an AI system in a way that is **appropriate to the context and target audience**. The disclosure must also comply with the **requirements of Article 50(5) AI Act** (see Checkpoint 3).

AI-generated or manipulated content

Article 50(2) AI Act

Step 1 – Does this obligation apply to you?

Does the AI system **generate or manipulate synthetic content**?

To answer this question, **all three elements** must be fulfilled:

1. It is an **AI system**, including a **GPAI system**;
2. The capability to **generate or manipulate synthetic content**;
3. The content is **audio, image, video or text**, including multimodal content, 3-D content, virtual, augmented or mixed reality and digital twins.

This obligation **aims to help people distinguish AI-generated or manipulated content from other content**.

It therefore does not apply to content that is unrelated to this objective, such as content that is intended to be interpreted, verified or acted upon by natural persons.

Yes

Step 2 – Does an exception apply?

Check whether one of these exceptions apply:

1. The AI system performs an **assistive function for standard editing**, meaning preparing existing content for publication or distribution without creating new content;
2. The AI system **does not substantially alter the input data** provided by the deployer or the semantics thereof, meaning that the input data or its semantics have not been manipulated significantly during the output generation process. This requires a case-specific assessment;
3. The AI system is **authorised by law to detect, prevent, investigate or prosecute criminal offences**.

Yes

No

You are exempt from the obligation.

Step 3 – What do you need to do?

You are responsible for **two distinct but interlinked obligations**, fulfilling one of them is not sufficient:

1. Firstly, the **output of the AI system must be marked in a machine-readable format**, meaning that software can identify, recognise and extract the mark without human intervention;
2. Secondly, the **output of the AI system must be detectable as AI-generated or manipulated content**, meaning that you must make means of detection available to the persons potentially exposed to the content.

Your technical solutions must be **effective, interoperable, robust and reliable** as far as this is technically feasible, taking into account the specificities and limitations of various types of content, the costs of implementation and the generally acknowledged state of the art, as may be reflected in relevant technical standards.

Checkpoint 2.2

The deployer track

DEPLOYER

You qualify as a deployer because you use an AI system under your own authority, unless the use is for a personal non-professional activity. This means that the purpose and manner of use of the AI system are decided by you. Employees and contractors acting under your instructions are not separate deployers.

Emotion recognition and biometric categorisation

Article 50(3) AI Act

Step 1 – Does this obligation apply to you?

Do you deploy **an emotion recognition system or a biometric categorization system** to natural persons?

Note that it is **irrelevant** whether the persons are exposed to such systems **in real-time** or **ex post**.

Yes

Step 2 – Does an exception apply?

Is the AI system **permitted by law to detect, prevent or investigate criminal offences**?

Yes

No

You are exempt from the obligation.

Step 3 – What do you need to do?

You are responsible to **inform all natural persons exposed to the operating AI system**, including children. Depending on the place of deployment, the audience, the length and type of the exposure and any existing relationship with the persons concerned, you may inform the natural persons in **writing, orally, by standardised icons** or a **combination** of such ways.

Deep fakes

Article 50(4), first subparagraph AI Act

Step 1 – Does this obligation apply to you?

Do you deploy an **AI system that generates or manipulates image, audio or video content constituting a deep fake?**

The **following three elements** must be fulfilled:

1. The system must be an **AI system**;
2. It must be used by the **deployer** for **professional purposes**;
3. The content must constitute a **deep fake**.

In order for content to be qualified as a **deep fake**, all four criteria set out in Article 3(60) of the AI Act must be met:

1. **Resemblance**, meaning that, on the basis of an objective comparison, there is an appreciable, high level of similarity between the content and the subject simulated. This comparison may be based on the extent to which the characteristic or distinctive features are represented by the deep fake;
2. **Existing**, meaning that the subject simulated exists, can plausibly exist or could plausibly have existed in reality;
3. The subject simulated must resemble existing **persons, objects, places, entities or events**;
4. The subject simulated **would falsely appear to be authentic or truthful**. The intention to deceive is not required.

Yes

Step 2 – Does an exception apply?

Is the AI system **authorised by law to detect, prevent, investigate or prosecute criminal offences?**

Yes

No

You are exempt from the obligation.

Step 3 – What do you need to do?

You are responsible for **disclosing that the content has been artificially generated or manipulated by labelling the output and disclosing its artificial origin**.

The label must be understandable and perceivable by natural persons **without them relying on technical tools or performing dedicated actions**.

Where the deepfake is **part of an evidently artistic, creative, satirical, fictional or analogous work or programme**, you must still disclose the artificial nature, but in an appropriate manner that does not hamper the display or enjoyment of the work. This **lighter disclosure regime** should be interpreted strictly.

Text informing the public on matters of public interest

Article 50(4), second subparagraph AI Act

Step 1 – Does this obligation apply to you?

Do you deploy an **AI system that generates or manipulates text which is published with the purpose of informing the public on matters of public interest**?

In order to answer this question, **two conditions** are required:

1. The system must be an AI system;
2. The AI system must be used to generate or manipulate text published with the purpose of informing the public on matters of public interest.

A **text is published** with the **purpose of informing the public on matters of public interest** if:

1. The text is **accessible** to an indeterminate, fairly large number of unrelated potential readers simultaneously and/or successively, whether or not against payment;
2. The text is **intended to inform the public** by communicating knowledge, opinions or facts;
3. The text informs the public on **matters of public interest**, such as politics, consumer safety, cultural development etc.

Yes

Step 2 – Does an exception apply?

Check whether one of these exceptions apply:

1. The AI system is **authorised by law to detect, prevent, investigate or prosecute criminal offences**;
2. 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.

Yes

No

You are exempt from the obligation.

Step 3 – What do you need to do?

You are responsible for **disclosing that the content has been artificially generated or manipulated by labelling the output and disclosing its artificial origin**.

The label must be **understandable and perceivable** by natural persons without the **use of technical tools** or **performance of dedicated actions**.

Checkpoint 3

The provider and deployer track

HORIZONTAL REQUIREMENTS FOR PROVIDERS AND DEPLOYERS

Article 50(5) AI Act

Information in a clear and distinguishable manner

Information is **clear** when it is noticeable, easy to understand and accessible to the person concerned. It is **distinguishable** when it can be easily recognised as separate from other information and from the environment in which it appears.

The information must also be **easy to understand**, considering the **target audience**, including for example children and people with disabilities.

At the time of the first interaction or exposure

The information must be provided **at the latest at the time of the first interaction or exposure**. This applies to every natural person.

Where it is reasonably foreseeable that people will not perceive the content from its beginning, a disclosure only at the start is not sufficient and must be complemented at later moments where possible.

Conform to the applicable accessibility requirements

Providers and deployers must **verify whether their product, service or content is subject to accessibility legislation**, such as Directive 2016/2102 and Directive 2019/882.

*This guide is based on Article 50 AI Act and on the [Commission Guidelines on the implementation of the transparency obligations for certain AI systems under Article 50 of the AI Act](#). **

** This tool is intended as a guide and should not be regarded as a substitute for the officially published text of the guidelines.*

Authors

Sabra Ibnouthen and Sultan Erdogan (Knowledge Centre Data & Society), "Article 50 AI Act transparency requirements guide", September 2026.