Art 50 AI Act in Practice

How to meet Transparency Obligations



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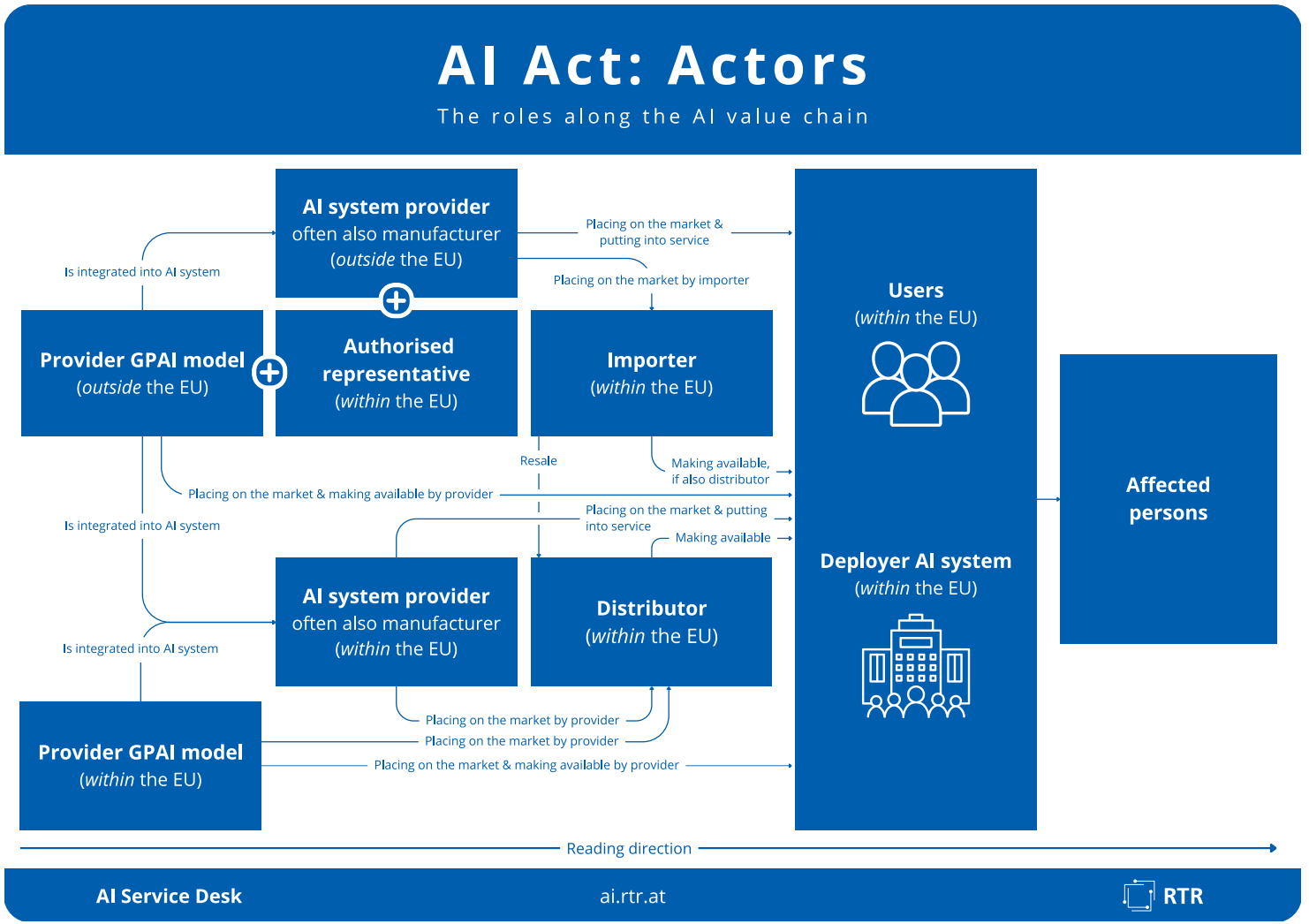
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RTR: AI Act Actors[1]

1. *Rundfunk und Telekom Regulierungs-GmbH (RTR-GmbH)*, Actors in the AI Act, 03/18/2026 <https://www.rtr.at/rtr/service/ki-servicestelle/ai-act/actors.en.html>.↩

Providers Bear Full Responsibility for Compliance

`Art. 3(3)`

Who Is a Provider?

The entity that **develops** an AI system and **places it on the market** under its own name or brand.

`Art. 16`

Core Obligations

- **Safety compliance** — meeting all essential requirements
- **Technical documentation** and instructions for use
- **Conformity assessment** and EU database registration

Source: Art. 3(3) & Art. 16 AI Act.

Deployers Must Actively Monitor and Document AI Use

Art. 3(4)

Who Is a Deployer?

Any entity **using AI** in business, public service, or professional activities — excluding personal use.

Art. 26

Compliance Checklist

- **AI Literacy** — training for all staff using AI
- **Monitoring** — active surveillance for operational risks
- **Logging** — maintain system logs (min. 6 months)
- **Human Oversight** — ensure meaningful human control

Source: Art. 3(4) & Art. 26 AI Act.

AI Act: Provider obligations

The scope of obligations decreases according to the risk classification of the AI system/AI model

	High risk AI system	**GPAI model** systemic risk	**GPAI model**	**AI system** limited risk	**AI system** minimal risk
AI literacy	Art. 4	Art. 4	Art. 4	Art. 4	Art. 4
Transparency towards downstream actors	Art. 13	Art. 55 (1)	Art. 53 (1) b	Art. 50 (1), (2)	
Data requirements	Art. 10	Art. 55 (1)	Art. 53 (1) c, d		
Technical documentation	Art. 11	Art. 55 (1)	Art. 53 (1) a		
Cooperation with authorities	Art. 21	Art. 55 (1)	Art. 53 (3)		
Appointment of authorized representative (if third country)	Art. 22	Art. 55 (1)	Art. 54		
Risk management	Art. 9	Art. 55 (1) a, b			
Accuracy, robustness and cybersecurity	Art. 15	Art. 55 (1) d			
Registration resp. notification obligations	Art. 49	Art. 52 (1)			
Reporting obligations to authorities	Art. 73	Art. 55 (1) c			
Record-keeping	Art. 12				
Implementation of human oversight tools	Art. 14				
Labelling requirements	Art. 16 b				
Ensuring accessibility requirements	Art. 16 l				
Quality management	Art. 17				
Documentation and log-keeping	Art. 18, 19				
Corrective actions	Art. 20				
Conformity assessment procedure, -declaration, -marking	Art. 43, 47, 48				

AI Service Desk ai.rtr.at **RTR**

Image: RTR: Provider Obligations[1]

1. *Rundfunk und Telekom Regulierungs-GmbH (RTR-GmbH)*, Provider obligations in the AI Act, <https://www.rtr.at/rtr/service/ki-servicestelle/ai-act/Provider_obligations.en.html>.↩

AI Act: Deployer obligations

The scope of obligations decreases according to the risk classification of the AI system

	High risk AI system	**AI system** limited risk	**AI System** minimal risk
AI literacy	Art. 4	Art. 4	Art. 4
Transparency towards downstream actors	Art. 26 (11)	Art. 50 (3), (4)	
Use of the AI system according to the instructions for use	Art. 26 (1), (3), (4)		
Human oversight	Art. 26 (2)		
Monitoring of the AI system	Art. 26 (5)		
Reporting of serious incidents	Art. 26 (5), 73		
Record-keeping	Art. 26 (6)		
Where relevant, data protection impact assessment	Art. 26 (9)		
Cooperation with competent national authorities	Art. 26 (12)		
Right to explanation of individual decision-making	Art. 86 (1)		
Information towards employee representatives *if employer uses high-risk AI systems in the workplace*	Art. 26 (7)		
Registration obligations *if EU institutions, EU bodies and other EU agencies*	Art. 26 (8), 49		
Authorisation by a judicial or administrative authorithy *if AI-system is used for post-remote biometric identification*	Art. 26 (10)		
Fundamental rights impact assessment *if i.a. public bodies and private entities provide public services*	Art. 27		

AI Service Desk ai.rtr.at **RTR**

Image: RTR: Deployer Obligations[1]

1. *Rundfunk und Telekom Regulierungs-GmbH (RTR-GmbH)*, AI Act: Deployer Obligations, <https://www.rtr.at/rtr/service/ki-servicestelle/ai-act/Deployer_obligations.en.html>.

Transparency Ensures Humans Know When AI Is Involved[1]

ART. 50(1-2)

Provider Duties

- **Interaction** — inform users they are dealing with AI
- **Watermarking** — mark AI outputs as machine-readable

ART. 50(3-4)

Deployer Duties

- **Biometrics** — inform when emotion or categorisation runs
- **Deepfakes** — disclose Deepfakes
- **Text** Public-interest content without human oversight

1. AI Act, Art 50. ↩

Providers Must Disclose Direct AI Interaction Unless It Is Obvious[1]

DUTY

Design for Notice

AI systems intended to interact **directly** with natural persons must be built so users know they are dealing with AI.

EXCEPTION

Obviousness Test

No duty if obvious to a **reasonably well-informed, observant and circumspect** person — judged by circumstances and context of use.

CARVE-OUT

Law Enforcement

Exempt when authorised by law to detect, prevent, investigate or prosecute crime — **unless** the system is public for reporting offences.

1. AI Act, Art 50(1). ↩

Generative Providers Must Mark Outputs -> Machine-Detectable[1]

DUTY

Machine-Readable Mark

Providers of systems generating synthetic **audio, image, video or text** — including GPAI — must mark outputs as artificially generated or manipulated.

QUALITY BAR

Feasible State of the Art

Solutions must be **effective, interoperable, robust and reliable** as far as technically feasible — costs, content type, and standards count.

EXCEPTION

Assistive Editing

No duty where AI only assists standard editing, does **not substantially alter** input or its semantics, or is law-enforcement authorised.

1. AI Act, Art 50(2). ↩

Deployers Must Notify People Exposed to Emotion or Biometric AI[1]

DUTY

Inform the Exposed

Deployers of **emotion recognition** or **biometric categorisation** systems must inform the natural persons exposed to the system's operation.

DATA LAW

GDPR Stack

Personal data must still be processed under **GDPR**,[2] Regulation (EU) 2018/1725, or the Law Enforcement Directive — as applicable.

CARVE-OUT

Crime Detection

Exempt only when permitted by law to detect, prevent or investigate criminal offences — with safeguards and in line with Union law.

1. AI Act, Art 50(3). ↩
2. Art 12, 13, 14 GDPR. ↩

Deepfakes — Definition and Disclosure Duty

ART. 3(60)

Legal Definition

‘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 to be **authentic or truthful**.

DUTY

Image · Audio · Video

Deployers must disclose that deepfake content was **artificially generated or manipulated** — unless authorised for crime-fighting.

ART / SATIRE

Attenuated Duty

For artistic, creative, satirical, fictional or analogous works: disclose existence **appropriately**, without hampering display or enjoyment.

Disclosure Must Be Clear, Accessible, and Delivered at First Exposure[1]

ART. 50(5)

Timing & Form

Information under paragraphs 1–4 must be **clear and distinguishable**, at the latest at first interaction or exposure, and meet accessibility requirements.

ART. 50(6)

Stacks, Not Substitutes

Paragraphs 1–4 do **not** affect Chapter III high-risk duties and leave other Union or national transparency obligations untouched.

1. AI Act, Art 50(5–6). ↩

Spot the Obligation: Who Must Disclose What?[1]

SCENARIO A

Support Chatbot

Customer-service bot that sounds human on a phone line.
→ Provider, Art. 50(1) — disclose AI interaction.

SCENARIO B

Image Model

GPAI provider ships a model that generates photos.
→ Provider, Art. 50(2) — machine-readable marks.

SCENARIO C

Campaign Video

Marketing team publishes an AI-altered spokesperson clip.
→ Deployer, Art. 50(4) — deepfake disclosure.

SCENARIO D

News Desk

AI-drafted article, edited by a named editor-in-chief.
→ Likely exempt, Art. 50(4) — editorial responsibility.

1. AI Act, Art 50. ↩

EU Guidelines Map

Transparency & Support

- **Code of Practice on Transparency** of AI-generated content.
- **Art. 50 Transparency Guidelines** — scope & interpretation.
- **EU Icons for Labelling** — optional icon set (Art. 50(4)).
- **Art. 50 Q&A** — practical transparency guidance.
- **AI Literacy Repository** & Q&A (Art. 4).

Scope & Definition

- **AI System Definition Guidelines** — scope of the Act.
- **Draft High-Risk Classification** (Art. 6).
- **Prohibited Practices Guidelines** (Art. 5).
- **EDPB 28/2024** — data processing in AI models.
- **MDCG 2025-6** — MDR/IVDR ↔ AI Act (AI Board/MDCG).

Official Templates

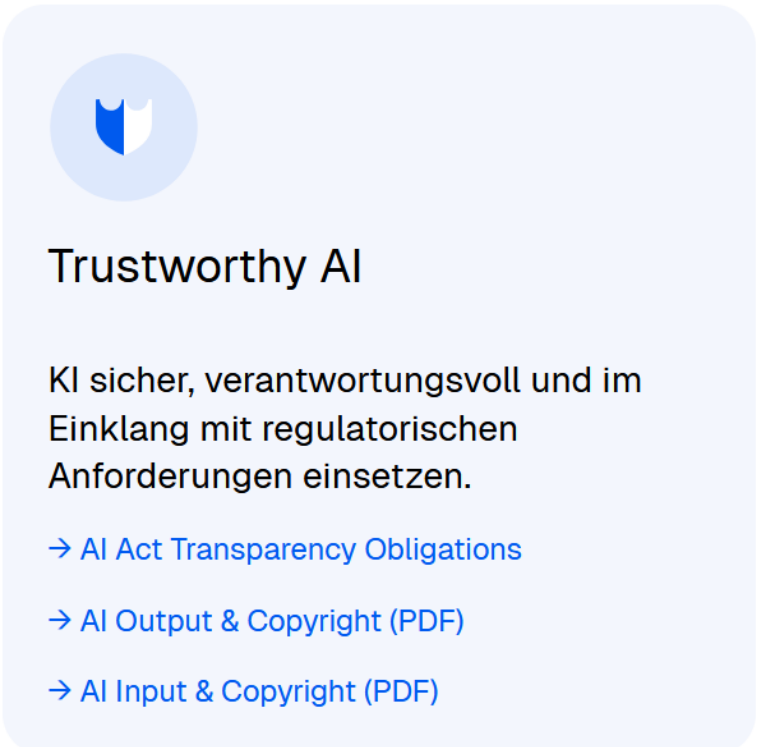
- **Model Documentation Form** — GPAI CoP Transparency (Art. 53).
- **Training Content Summary** — Art. 53(1)(d).
- **GPAI Serious-Incident Template** — systemic risk (Art. 55).
- **Draft Incident Reporting** — Art. 73 (high-risk).

GPAI Framework

- **GPAI Code of Practice** — Transparency, Copyright, Safety.
- **Commission Opinion** assessing adequacy of the GPAI Code.
- **Scope & Obligations Guidelines** for GPAI providers.
- **GPAI Q&A** & Code Q&A.

Sources: European Commission / AI Office (guidelines, codes, templates, icons, FAQs); EDPB 28/2024; MDCG 2025-6 (2025/2026).

Transparency Primer



AI:AT — Trustworthy AI Services - https://ai-at.eu/services/

Scan for the Article 50 primer (PDF).

Contact

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References

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——, Provider obligations in the AI Act, <https://www.rtr.at/rtr/service/ki-servicestelle/ai-act/Provider_obligations.en.html>, aufgerufen am 10/20/2025

——, AI Act: Deployer Obligations, <https://www.rtr.at/rtr/service/ki-servicestelle/ai-act/Deployer_obligations.en.html>, aufgerufen am 10/20/2025