

If your product includes AI-powered chat or voice interactions—and especially if you have users in the European Union—you've likely asked yourself: *Do I need to explicitly tell users they are talking to AI?* This question is no longer hypothetical. The recently enacted **EU AI Act article 50** lays out specific transparency requirements for AI systems, raising important compliance and ethical considerations for businesses worldwide.

In this article, we'll explore the key elements of AI interaction disclosure under the EU AI Act, with insights from regulatory bodies like the **European Commission** and the **European Data Protection Supervisor**, and examples from AI companies such as **Coruzant Technologies**. We'll also discuss how these requirements affect both providers and deployers of AI systems, and the implications for products with voice interfaces and screen reader accessibility.

Understanding the EU AI Act Article 50 Transparency Requirement

The EU AI Act is a comprehensive legal framework designed to regulate artificial intelligence technologies, ensuring their safe and ethical use within the European Union. Among its many provisions, Article 50 specifically mandates transparency in AI interactions.

What Does Article 50 Say About AI Interaction Disclosure?

Article 50 requires that users be informed when they are interacting with an AI system, unless this is obvious from the circumstances. Practically, this means that if your product features a chat or voice interface powered by AI—like a conversational agent or virtual assistant—you must clearly coruzant.com and conspicuously disclose to users that they are not talking to a human but an AI.

This disclosure should occur at the **first interaction** with the AI system. The goal is to foster trust and allow users to make informed decisions during their experience, particularly in contexts where the system's capabilities or limitations may impact user expectations or outcomes.

The Role of the European Commission and Data Protection Agencies

The **European Commission** has emphasized that transparency is key in mitigating risks associated with AI adoption, including unintended biases and misuse. Alongside, the **European Data Protection Supervisor (EDPS)** advocates for clear communication to uphold user rights and privacy. Their guidance underscores that ambiguous or buried disclosures undermine trust and violate user autonomy.

As a UX writer turned product manager, I keep a running list of "support tickets caused by unclear UI." Many stem from AI systems that don't properly communicate their nature, leading to user confusion or misplaced expectations. The EU AI Act's Article 50 essentially codifies the solution we've been advocating for years: transparency must be upfront and unmistakable.

Provider Responsibility vs. Deployer Responsibility: Who Must Disclose?

One complex aspect of the AI interaction disclosure requirement lies in clarifying responsibility. The EU AI Act distinguishes between:



- **Providers:** Companies who develop AI systems and supply them to others.
- **Deployers:** Businesses or entities who integrate and use AI systems in their products or services.

Both parties have transparency obligations, but their scope and implementation differ.

Provider Transparency Obligation

Providers must equip their AI systems with documentation and mechanisms enabling deployers to meet disclosure requirements. For example, they may offer standard disclosure copy, API tags indicating AI interaction, or interface templates that facilitate upfront AI identity statements.

Coruzant Technologies, a notable AI service provider, has integrated compliance frameworks into their platform to assist clients in meeting Article 50 requirements. By embedding transparency features directly into their AI infrastructure, they help reduce the risk of missing or unclear disclosures.

Deployer Responsibility

Deployers bear the direct obligation to implement these disclosures in the user experience. This entails:

- Showing or announcing to users right away that they are interacting with AI, using clear and accessible language.
- Ensuring disclosures are compatible with assistive technologies like screen readers, to meet accessibility standards.
- Training customer support and communication teams on these obligations to avoid contradictory or confusing messaging.

Both providers and deployers must coordinate, but ultimately, the entity controlling the user interface and customer interaction must ensure compliance.

Extraterritorial Reach: What Non-EU Companies Should Know

The EU AI Act applies not only to companies based in the EU but also to those outside the union whose AI systems affect users within the EU. This extraterritorial reach means that:



- If your company is global and offers AI chatbots or voice assistants accessible to EU residents, you're subject to Article 50 transparency rules.
- Non-EU providers and deployers must adapt their disclosures to comply with EU regulations—even if their headquarters is elsewhere.

This aligns with the broader approach the EU takes on data protection—and AI regulation—to protect its citizens' rights in the digital economy. So, international businesses must carefully audit and update their AI interaction disclosure processes.

Disclosures in Voice Product Interfaces and Screen Readers

Many products incorporate AI through voice-enabled assistants or chatbots that interact via audio. Complying with the EU AI Act's disclosure requirements in these contexts involves unique challenges and opportunities.

First-Interaction Disclosure Timing in Voice Interfaces

The **first interaction** is critical. For voice products, this means delivering a clear verbal disclosure at the outset. For example, a voice assistant might say:

"Hi, I am your virtual assistant powered by AI, here to help you with your questions."

It's important to test this disclosure out loud, much like a voice assistant intro script, ensuring it sounds natural and informative—not intrusive or robotic. Remember to avoid ambiguous phrasing or industry jargon that could confuse users unfamiliar with AI technology.

Screen Readers and Accessibility Concerns

Screen readers and other assistive technologies must be able to detect and relay AI disclosures accurately. Designers and developers should ensure that disclosure text is:

- Properly marked up with semantic HTML to be announced correctly by screen readers.
- Included in ARIA labels or live regions if dynamically injected into the interface.
- Present in both visual and non-visual interaction modes.

The EU AI Act mandates accessibility rights, and organizations like the European Data Protection Supervisor have stressed that ignoring accessibility is an afterthought that risks legal and reputational consequences.

Summary: What Your Product Team Needs to Do Now

Key Action	Description	Responsible Party	Implement
Clear Initial Disclosure	Show or say upfront that the user is interacting with AI, using simple and accessible language.	Deployer	Integrate
Provider Support	Use provider-supplied tools or templates that embed transparency features.	Provider	Test
Accessibility Verify	disclosure is compatible with screen readers and other assistive tech.	Deployer	Educate
Teams Train	support and communications teams on transparency obligations to avoid unclear messaging.	Deployer & Provider	Auditing & Compliance Review
AI interfaces and documentation	regularly to confirm ongoing compliance with Article 50.	Both	

Final Thoughts

Transparency about AI interactions is not just a legal checkbox under the **EU AI Act article 50**—it’s a crucial element for building trust with users in the digital age. Whether you’re a provider like **Coruzant Technologies** offering AI solutions or a deployer integrating AI into your products, embracing clarity and accessibility benefits everyone.

As a former UX writer who partnered extensively with legal and accessibility teams, I’ve seen firsthand how early and clear communication prevents countless “support tickets caused by unclear UI.” The EU’s approach, reflected in guidelines from the **European Commission** and **European Data Protection Supervisor**, reinforces that transparency in AI is an expectation that should be designed into the very first interaction.

For product managers and teams shipping AI chat and voice experiences, the takeaway is clear: comply, communicate, and put users first.