



Article 50 Gap Report — SAMPLE

Prepared by Aurora Compliance Advisors (DEMO)

Client: Nordwind Travel GmbH — a FICTIONAL company used for this sample. All answers below are a realistic demo scenario, not a real assessment.

Legal basis: Regulation (EU) 2024/1689, Article 50 — <https://eur-lex.europa.eu/eli/reg/2024/1689/oj>

High exposure — action required, Article 50 applies from 2 August 2026

Scenario assessed (demo): EU users — yes; customer-support AI chatbot — yes (not obvious to users); provider of AI-generated marketing images — yes (not assistive-only).

Obligations that apply (2)

Article 50(1) — Chatbot / AI interaction disclosure

AI systems intended to interact directly with natural persons must be designed so that people are informed they are interacting with an AI system, unless this is obvious to a reasonably well-informed, observant and circumspect person.

What to do: Add a clear, always-visible disclosure at the start of every AI interaction (e.g. 'You are chatting with an AI assistant'). It must be provided at the latest at the time of first interaction, in a clear and distinguishable manner (Article 50(5)).

Article 50(2) — Machine-readable marking of synthetic content

Providers of AI systems generating synthetic audio, image, video or text must ensure outputs are marked in a machine-readable format and detectable as artificially generated or manipulated. Solutions must be effective, interoperable, robust and reliable as far as technically feasible.

What to do: Embed provenance metadata in generated media (C2PA Content Credentials is the leading interoperable standard) and/or apply watermarking. For text, use metadata or detectable markers where feasible.

Notes

- GDPR cross-check: processing personal data with AI requires a lawful basis (GDPR Article 6) and transparency information at collection (Articles 13-14) — your privacy notice should state that personal data is processed by an AI system and for what purpose. AI Act disclosures do not replace GDPR duties (see Regulation (EU) 2016/679).
- GDPR cross-check: chatbot conversations containing personal data fall under the GDPR. If you use them for model training, name that purpose and lawful basis explicitly; solely automated decisions with legal or similarly significant effects trigger GDPR Article 22 safeguards.
- Article 50(5): all disclosures must be clear and distinguishable, delivered at the latest at first interaction or exposure, and meet applicable accessibility requirements.
- Penalties: non-compliance with Article 50 obligations can attract administrative fines of up to EUR 15,000,000 or 3% of total worldwide annual turnover, whichever is higher (Article 99(4)(g)).