

# Transparent AI Disclosure Obligations: Who, What, When, Where, Why, How

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What are the **key considerations and concerns** surrounding **transparent AI disclosures** in the context of the **European AI Act**?



Workshop 1

**Framework:** 5W1H (Who, What, When, Where, Why, How) framework with focus on media sector

**Objectives:** Deconstruct relevant clauses in Article 52, and derive key questions

**Participants:** 16 (8f, 7m, 1n) across two workshops

**Varied expertise:** Computer science and engineering, HCI and design, communication science, law, political science

**Analysis:** Inductive thematic analysis



Workshop 2

## Article 52\*: “Transparency obligations for providers and users of certain AI systems”

“§ 1. **Providers** shall ensure that AI systems intended to interact with natural persons are designed and developed in such a way that **natural persons are informed that they are interacting with an AI system** unless this is obvious from the circumstances and the context of use.”

“§ 3. **Users** of an AI system that generates or manipulates image, audio or video content that appreciably resembles existing persons, objects, places or other entities or events and would falsely appear to a person to be authentic or truthful ('deep fake'), **shall disclose that the content has been artificially generated or manipulated.**”

\*(2022 revision)

### Theme 1: Ethical, Legal, and Policy Considerations

#### Ethical Implications of AI Use

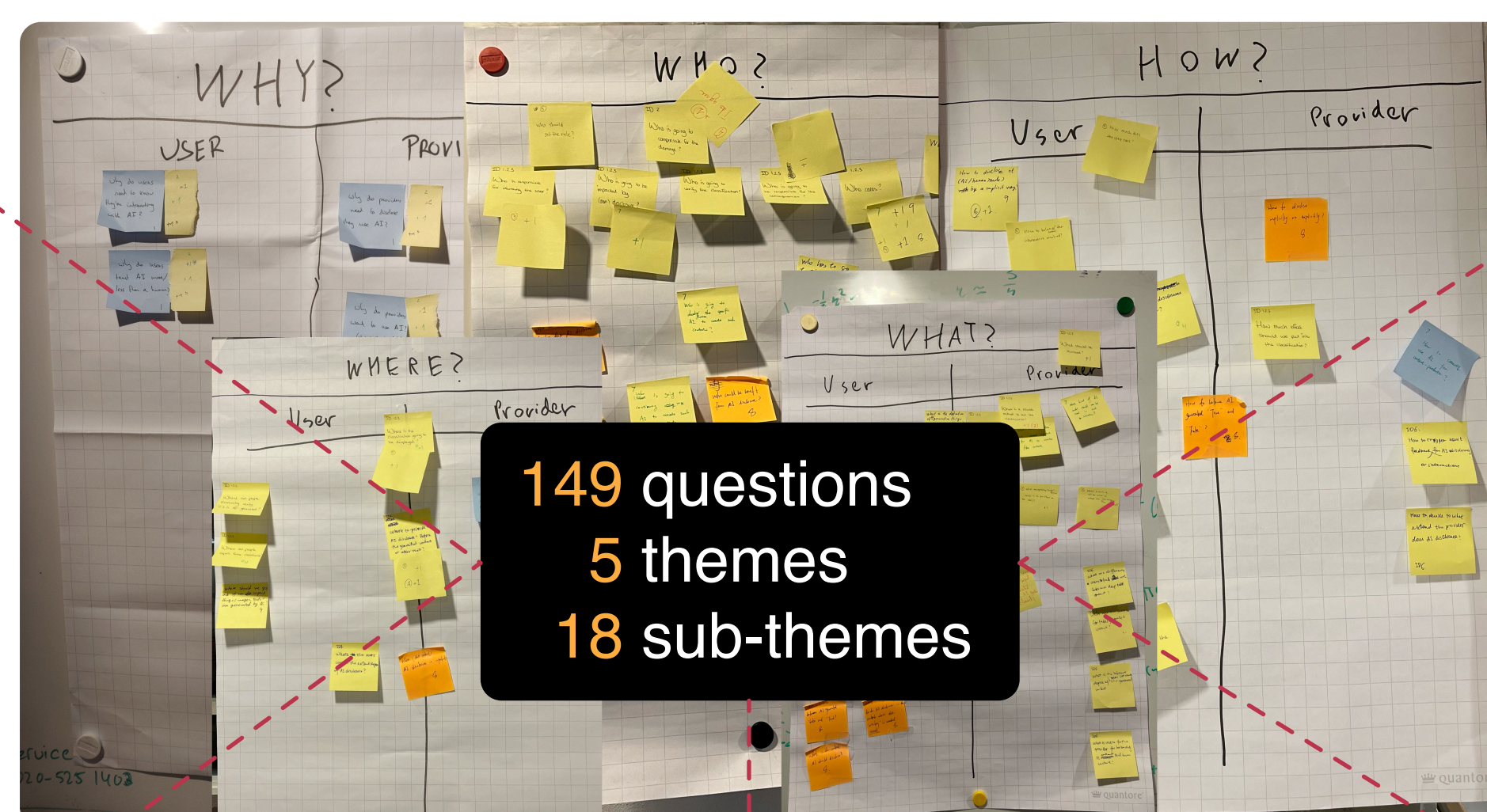
“How dangerous is the content generated by AI?” [Q2]

#### Legal Compliance and AI Disclosure

“Who is going to be responsible for the consequences?” [Q8]

#### Policy and Regulatory Impact

“When do users need to disclose the use of AI?  
Consider continued influence effect” [Q24]



### Theme 2: Future Considerations, Evolving Context, & Practical Implementation

#### Evolving AI Technologies and Societal Impact

“When can AI generated content affect real life affairs?” [Q45]

#### Future Trends and Legal Adaptation

“Why should people care about this?” [Q50]

#### Practical Challenges in AI Implementation

“How much effort should be put into the classification?” [Q56]

### Theme 3: Provider Responsibility and Industry Impact

#### Ethical Considerations for Providers

“Why do providers need to disclose they use AI?” [Q62]

#### Industry-Specific Impact and Challenges

“What industry will be affected the most?” [Q71]

#### Provider Disclosure Obligations

“Where to label information / content?” [Q74]

### Theme 4: Trust, Authenticity, and User Empowerment

#### Authenticity, Provenance, and Transparency

“How important is it for users to know the authenticity of media?” [Q81]

#### Building Trust in AI Systems

“How will different users interpret signals differently?” [Q89]

#### Empowering Users through Education & Awareness

“Where should we get ask if we suspect things (images, texts) are generated by AI?” [Q103]

#### User Responsibility and Agency

“Why is it important for promoting democracy?” [Q112]

### Theme 5: User Experience, Information Overload, & Personalization

#### Personalization and User Preferences

“How to adapt AI disclosures personally?” [Q117]

#### Psychology of Human-AI Interaction

“Why do users trust AI more/less than a human?” [Q120]

#### Standardization

Who determines how disclosure should be provided, according to which standards?” [Q128]

#### User Interfaces and Information Overload

“Where is the balance between communicating enough and information overload?” [Q134]

#### User-Centric Information Design

“Where to provide the AI disclosure? Before the generated content or after that?” [Q142]

