

EU AI Act Compliance Matrix

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This resource is intended to aid in compliance with the EU AI Act by providing a high-level overview of its key requirements for organizations. The tables below illustrate the articles of the EU AI Act that apply to each [operator](#) across three broad classes: [high-risk AI systems](#), [AI systems](#) and [general-purpose AI models](#). Some requirements apply only to certain operators, i.e., providers, deployers, product manufacturers, authorized representatives, importers and distributors, while some apply to multiple or all operators.

The checkmarks in the tables below indicate the operators to which the article is of primary relevance, recognizing it may still be applicable or relevant to others not explicitly referenced.

The analysis herein is based on the [EU AI Act](#) published 13 June 2024 in the Official Journal of the European Union.

View a more condensed version of this resource at iapp.org.

Additional IAPP Resources on the EU AI Act

- [EU AI Act: 101](#)
- [EU AI Act: Next Steps for Implementation](#)
- [Top 10 operational impacts of the EU AI Act](#)
- [EU AI Act cheat sheet](#)
- [Global AI Law and Policy Tracker](#)

The operators



Providers

A provider is defined as a "natural or legal person, public authority, agency or other body that develops an AI system or a general-purpose AI model or that has an AI system or a general-purpose AI model developed and places it on the market or puts the AI system into service under its own name or trademark, whether for payment or free of charge," according to Article 3(3). Providers may be established or located within the EU or in a third country, if they place AI systems or general-purpose AI models on the market or put them into service in the EU, or if the output produced by the AI system is used in the EU, per Article 2(1)(a/c).

Deployers

Article 2(10) defines a deployer as "a natural or legal person, public authority, agency or other body using an AI system under its authority," per Article 3(4). It does not include "natural persons using AI systems in the course of a purely personal non-professional activity." If the output produced by the AI system is used in the EU, deployers may be established or located either within the EU or in a third country, as outlined in Article 2(1)(b-c).

Importers

An importer is "a natural or legal person located or established in the Union that places on the market an AI system that bears the name or trademark of a natural or legal person established in a third country," per Article 3(6).

Distributors

A distributor is "a natural or legal person in the supply chain, other than the provider or the importer, that makes an AI system available on the Union market," according to Article 3(7).

Product manufacturers

A product manufacturer places an AI system on the market or puts it into service "together with their product and under their own name or trademark," per Article 2(1)(e). Article 25(3) notes, "in the case of high-risk AI systems that are safety components of products covered by the Union harmonization legislation listed in Section A of Annex I, the product manufacturer shall be considered to be the provider of the high-risk AI system and shall be subject to obligations under Article 16 under either of the following circumstances:

- The high-risk system is placed on the market together with the product under the name or trademark of the product manufacturer;
- The high-risk system is put into service under the name or trademark of the product manufacturer after the product has been placed on the market."

Authorized representatives

An authorized representative is "a natural or legal person located or established in the Union who has received and accepted a written mandate from a provider of an AI system or a general-purpose AI model to, respectively, perform and carry out on its behalf the obligations and procedures" established by the AI Act, according to Article 3(5).

Who or what is excluded?

A nonexhaustive list

→ According to Article 2(3), AI systems "placed on the market, put into service, or used with or without modification exclusively for military, defense or national security purposes," or AI systems "not placed on the market or put into service in the Union, where the output is used in the Union exclusively for military, defense or national security purposes."

→ According to Article 2(4), public authorities in third countries and international organizations "where those authorities or organizations use AI systems in the framework of international cooperation or agreements for law enforcement and judicial cooperation with the Union or with one or more Member States, provided that such a third country or international organisation provides adequate safeguards with respect to the protection of fundamental rights and freedoms of individuals." According to Article 2(6), AI systems and AI models and outputs "specifically developed and put into service for the sole purpose of scientific research and development."

→ According to Article 2(8), "research, testing or development activity regarding AI systems or models prior to their being placed on the market or put into service," insofar as it is not considered "testing in real world conditions."

→ According to Article 2(10), "deployers who are natural persons using AI systems in the course of a purely personal non-professional activity."

→ According to Article 2(12), "AI systems released under free and open-source licenses, unless they are placed on the market or put into service as high-risk AI systems or as an AI system that falls under Article 5 or 50."

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 6 Classification rules for high-risk AI systems → Provides a set of conditions for use in determining whether an AI system is high risk, as well as documentation requirements for certain providers.	✔					
Article 8 Compliance with the requirements → Lays out how providers of high-risk AI systems may demonstrate compliance with their obligations.	✔					
Article 9 Risk management systems → Outlines steps for the establishment, implementation, documentation and maintenance of risk management systems.	✔					
Article 10 Data and data governance → Establishes requirements for training, validation and testing datasets.	✔					
Article 11 Technical documentation → Establishes requirements for the drawing up of technical documentation before a high-risk AI system can be placed on the market.	✔					

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 12 Record-keeping → Establishes rules for the automatic recording of events, or logs, over the lifetime of a system.	☑					
Article 13 Transparency and provision of information to deployers → Establishes requirements for what "instructions for use" should contain and how they should be made transparent to deployers.	☑	☑		☑		
Article 14 Human oversight → Creates rules for oversight measures commensurate with the risk, level of autonomy and context of use of high-risk AI systems.	☑	☑				
Article 15 Accuracy, robustness and cybersecurity → Establishes technical rules for the design of high-risk AI systems to achieve accuracy, robustness and cybersecurity throughout their life cycles.	☑					
Article 16 Obligations of providers of high-risk AI systems → Clarifies requirements around documentation, quality management, conformity assessment, registration and other obligations.	☑					

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 17 Quality management system → Establishes rules around the policies, procedures and instructions for implementing quality management systems.	☑					
Article 18 Documentation keeping → Ensures providers keep the documentation required by Article 11 at the disposal of national competent authorities for a period of at least 10 years.	☑			☑		
Article 19 Automatically generated logs → Ensures providers keep the logs referred to in Article 12 for at least six months.	☑					
Article 20 Corrective actions and duty of information → Requires providers to take corrective actions, withdraw, disable or recall high-risk AI systems that are not in conformity.	☑	☑		☑	☑	☑
Article 21 Cooperation with competent authorities → Requires providers to supply information and documentation to demonstrate conformity to a competent authority following a reasoned request.	☑					

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 22 Authorized representatives of providers of high-risk AI systems → Requires providers established in third countries to appoint authorized representatives in the EU to perform certain tasks.	☑			☑		
Article 23 Obligations of importers → Imposes obligations on importers to ensure providers comply with certain requirements, such as the conformity assessments in Article 43 and technical documentation in Article 11.	☑			☑	☑	
Article 24 Obligations of distributors → Imposes obligations on distributors to ensure providers and importers comply with their obligations in Article 16 and Article 23.	☑				☑	☑
Article 25 Responsibilities along the AI value chain → Establishes certain conditions under which a distributor, importer, deployer or other third party may be considered a provider of a high-risk AI system.	☑	☑	☑		☑	☑

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 26 Obligations of deployers of high-risk AI systems → Imposes obligations on deployers to take certain appropriate technical and organizational measures and to assign human oversight.	☑	☑			☑	☑
Article 27 Fundamental rights impact assessments for high-risk AI systems → Requires deployers to perform assessments of the systems' impact on fundamental rights, including the specific risks of harm, and to notify the market surveillance authority of their results.		☑				
Article 41 Common specifications → Lays out procedures for providers to comply with common specifications adopted by the Commission.	☑					
Article 43 Conformity assessments → Lays out options for certain providers to demonstrate compliance with conformity assessment procedures.	☑					
Article 44 Certificates → Allows certain providers to request extensions to the validity of certificates issued by notified bodies.	☑					

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 47 EU declaration of conformity → Requires providers to draw up EU declarations of conformity and keep them at the disposal of national competent authorities for 10 years.	☑					
Article 48 CE marking → Establishes accessibility and display criteria for CE markings.	☑					
Article 49 Registration → Requires providers, authorized representatives, when applicable, and deployers to register themselves and their systems in the EU database referred to in Article 71.	☑	☑		☑		
Article 71 EU database for high-risk AI systems listed in Annex III → Requires providers, authorized representatives, when applicable, and deployers registered in accordance with Articles 49 and 60 to enter data into an EU database established by the Commission.	☑	☑		☑		

HIGH-RISK AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 72 Post-market monitoring by providers and post-market monitoring plan for high-risk AI systems → Requires providers to establish and document post-market monitoring systems proportionate to the nature of the AI technologies and risks of the high-risk AI system.	✔	✔				
Article 73 Reporting of serious incidents → Requires providers to report any serious incidents to the market surveillance authority of the member state where the incident occurred within various timeframes depending on severity.	✔	✔				
Article 86 Right to explanation of individual decision-making → Gives any affected person subject to certain decisions by deployers the right to obtain "clear and meaningful explanation" from the deployer.		✔				

AI SYSTEMS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 4 AI literacy → Requires providers and deployers to take measures to develop the AI literacy of their staff and other people who operate/use AI systems on their behalf.	☑	☑				
Article 49 Registration → Requires providers and authorized representatives, when applicable, to register themselves and their systems in the EU database referred to in Article 71.	☑			☑		
Article 50 Transparency obligations for providers and users of certain AI systems → Ensures providers of AI systems that interact directly with natural persons make it clear to the natural person that they are interacting with an AI system.	☑	☑				
Article 71 EU database for high-risk AI systems listed in Annex III → Requires providers, authorized representatives, when applicable, and deployers of AI systems registered in accordance with Articles 6(4) and 49 to enter data into an EU database established by the Commission.	☑	☑		☑		

GENERAL-PURPOSE AI MODELS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
Article 41 Common specifications → Lays out requirements for providers to comply with common specifications adopted by the Commission.	✔					
Article 51 Classification of general-purpose AI models as general-purpose AI models with systemic risk → Lays out the conditions under which a general-purpose AI model should be classified as a "general-purpose AI model with systemic risk."	✔					
Article 52 Procedure → Establishes procedures for the providers of general-purpose AI models that meet the conditions of Article 51, such as notifying the Commission or requesting reassessment.	✔					
Article 53 Obligations for providers of general-purpose AI models → Establishes requirements for drawing up and updating technical documentation regarding a model's training, testing, evaluation and integration with AI systems.	✔					

GENERAL-PURPOSE AI MODELS

Article	Providers	Deployers	Product manufacturers	Authorized representatives	Importers	Distributors
<p>Article 54 Authorized representatives of providers of general-purpose AI models → Lays down rules for providers established in third countries to appoint authorized representatives in the EU.</p>	✔			✔		
<p>Article 55 Obligations for providers of general-purpose AI models with systemic risk → Requires providers of general-purpose AI models with systemic risk to perform model evaluations and to assess and mitigate possible systemic risks.</p>	✔					
<p>Article 56 Codes of practice → Outlines procedures for providers of general-purpose AI models and downstream providers to be invited to participate in drawing up codes of practice and to adhere to them.</p>	✔					
<p>Article 89 Monitoring actions → Enables downstream providers to lodge complaints alleging AI Act infringement.</p>	✔					

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