



AI & Partners

Amsterdam - London - Singapore

EU AI Act

Trustworthy AI for the Digital Decade

How the novel AI legislation supports the European commitment to a secure, safe, and sustainable digital transition shaped by European Values via mandating requirements for the development, deployment and supply of trustworthy AI.

February 2025

AI & Partners



AI & Partners

Amsterdam – London - Singapore

AI & Partners defends and extends the digital rights of users at risk around the world. By combining direct technical support, comprehensive policy engagement, global advocacy, grassroots professional services, regulatory interventions, and participating in industry groups such as AI Commons, we fight for fundamental rights in the artificial intelligence age.

This report was prepared by Sean Donald John Musch and Michael Charles Borrelli. For more information visit <https://www.ai-and-partners.com/>.

Contact: Michael Charles Borrelli | Director | m.borrelli@ai-and-partners.com.

This report is an AI & Partners publication.



Our report highlights that the EU AI Act aligns closely with the Declaration on Digital Rights and Principles, supporting a digital transformation rooted in European values.

This alignment provides companies with a clear framework to integrate ethical standards into their digital agendas. As a result of following the Act's guidelines, firms can ensure their AI systems respect individual rights, promote inclusivity, support freedom of choice, and enhance security and sustainability. Moreover, this human-centered approach not only helps companies meet regulatory expectations but also empowers them to lead responsibly in the digital age. Lastly, this trustworthiness is crucial for encouraging widespread adoption of AI technologies that can drive innovation.

About this report

This report is based on market research, publicly available data, and interviews with AI specialists in AI & Partners, financial services organisations, and relevant third-parties. Moreover, quotations provided on specific topics reflect those of AI specialists at AI & Partners to be as representative as possible of real-world conditions. All references to EU AI Act reflect the version of text valid as at 13 June 2024. Accessible [here](#).



Contents

1. Executive Summary	5
2. Understanding Europe’s Digital Decade	6
Origins of the EU AI Act	7
The Need for Responsible AI Systems	7
The EU AI Act: Key Provisions and Objectives	8
National Contributions to Responsible AI Development	9
Importance of the AI Act for a Human-Centric Digital Future	9
3. Understanding the Digital Rights and Principles	11
People at the Centre	12
People at the centre	12
Solidarity and Inclusion	13
Solidarity and Inclusion	13
Connectivity	14
Digital Education, Training and Skills	14
Fair and Just Working Conditions (A)	15
Fair and Just Working Conditions (B)	16
Digital Public Services Online	16
Freedom of Choice	17
Interactions with algorithms and artificial intelligence systems (A)	17
Interactions with algorithms and artificial intelligence systems (B)	18
A fair digital environment (A)	18
A fair digital environment (B)	19
Participation	20
Participation (A)	20
Participation (B)	21
Participation (C)	21
Participation (D)	22
Safety and Security	23
A protected, safe and secure digital environment	23
Privacy and individual control over data (A)	23
Privacy and individual control over data (B)	24
Privacy and individual control over data (C)	25
Protection and empowerment of children and young people in the digital environment (A)	25
Protection and empowerment of children and young people in the digital environment (B)	26



Protection and empowerment of children and young people in the digital environment (C)	26
Sustainability	27
Sustainability (A)	27
Sustainability (B)	28
4. Measuring the State of the Digital Decade: 2024	30
Digital Transformation Objectives for the EU by 2030	30
Progress Overview for 2024	30
Mapping Against the EU AI Act and Related Regulations	31
Strategic Investments and Partnerships	31
Challenges and Recommendations for Accelerating Progress	32
5. Case Study: France 2024	33
Key Takeaways for France's Digital Progress	33
Digital Decade KPIs for AI	33
Key Statistics on Digital Rights and Principles	34
EU AI Act: Protecting and Empowering Society	34
6. Conclusion	36
Annex B – Third-Party Opinions (Karushkov)	38
Opinion 1	38
Opinion 2	38
About AI & Partners	39
Contacts	39
Authors	39
References	40
Acknowledgements	41
Corporate Partners	41
Individual Partners	42



1. Executive Summary

The EU AI Act represents a comprehensive and pioneering regulatory framework that aims to establish trustworthy AI across Europe. It aligns closely with the European Union's (EU) digital transformation agenda, placing European values such as human rights, transparency, accountability, safety, and inclusivity at its core. As part of the broader Digital Decade strategy, the Act's primary focus is to regulate AI systems based on their risk level while fostering innovation and competitiveness.

The EU AI Act's risk-based classification system divides AI systems¹ into four categories: unacceptable risk, high-risk, limited risk, and minimal risk – with a distinct and particular category of risk for AI systemic risks. AI practices deemed as posing "unacceptable risk," such as those violating fundamental rights or engaging in biometric surveillance for mass tracking, are prohibited outright. High-risk AI systems, including, but not limited to, those used in healthcare, law enforcement, and critical infrastructure, face stringent requirements to ensure accuracy, transparency, and compliance with ethical standards. This approach aims to address concerns about bias, discrimination, privacy violations, and accountability in AI deployments.

The Act establishes robust transparency requirements, particularly for AI systems that interact directly with natural persons or impact decision-making processes. By mandating disclosures about an AI system's function, capabilities, limitations, and data usage, the regulation seeks to foster user trust and informed decision-making. Companies must ensure their AI systems (or AI models in some cases) meet these transparency benchmarks to remain compliant.

To facilitate compliance, the EU has created a supportive framework that includes regulatory sandboxes, an AI Office, and technical guidance for small and medium-sized enterprises (SMEs). This collaborative approach encourages innovation while maintaining ethical safeguards. National strategies play a key role in implementing the AI Act, with member states like Belgium, Germany, and Sweden leading efforts to promote responsible AI use in social services, education, and more.

The Act's human-centric approach, with Europe's citizens at the centre, aims to protect fundamental rights, mitigate bias, and enhance the democratic framework by ensuring that AI systems align with European values. Furthermore, the EU AI Act has already influenced similar regulatory efforts globally, highlighting Europe's leadership in AI governance.

Importantly, the Act contributes to building a resilient digital economy by promoting ethical AI use, supporting innovation within clear boundaries, and establishing a predictable regulatory landscape for businesses. The emphasis on harmonized standards, accountability mechanisms, and ethical AI development ensures that technological advancements benefit society as a whole.

The EU AI Act's provisions are intricately connected with other EU digital policies, including the Digital Services Act, the Data Governance Act, and measures promoting digital skills. Together, these initiatives form a cohesive regulatory framework to promote digital transformation, ethical AI adoption, and societal trust.



¹ The term "AI System" is an all-encompassing term that refers to AI systems, GPAI models, and GPAI systems, where necessary.



2. Understanding Europe's Digital Decade

The EU is working towards a citizen-focused, sustainable vision for a digital society throughout the digital decade, aiming to empower both individuals and businesses.

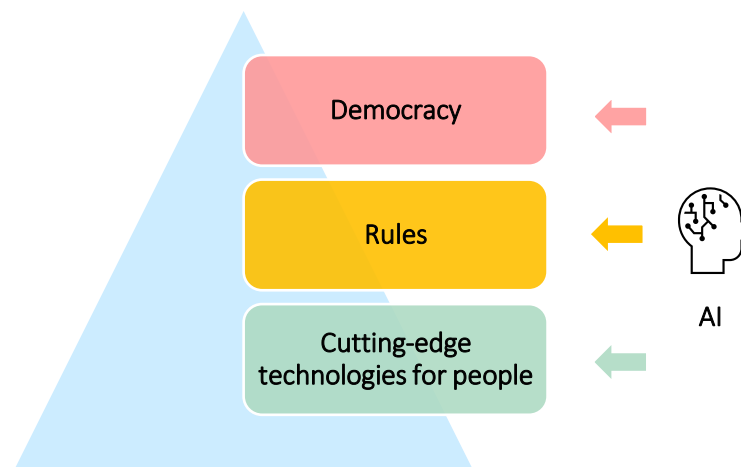
Digital advancements offer new ways to learn, work, entertain, explore, and achieve aspirations. These technologies introduce fresh freedoms – *and opportunities* – and rights, enabling EU citizens to extend their reach beyond traditional boundaries of physical communities, geography, and social standing.

Despite these opportunities, challenges remain as the digital transformation progresses. A digitally inclusive society, rooted in European values, aims to leave no one behind and ensures freedom, protection, and fairness for all. Europe's vision for the Digital Decade promotes widespread digital skills so that every individual can effectively use technology in daily life. Small and large businesses alike are empowered to use digital tools to make smarter decisions, enhance customer interactions, and streamline operations. Connectivity initiatives focus on reaching rural, mountainous, and remote areas, ensuring access to online opportunities and full participation in the benefits of a digital society. Key public services and administrative processes are also digitized to better serve citizens and businesses. The Digital Decade framework, developed by the EU, serves as a guiding structure for all digital-related efforts. Its overarching goal is to ensure technology and innovation are truly beneficial for people. **Figure 1** shows AI's application within the broader framework.

Key elements of this framework include:

- **Targets:** Specific, measurable goals across four key areas—connectivity, digital skills, digital business, and public digital services.
- **Objectives:** These outline the actions that Member States should undertake, with annual reports from the Commission tracking their progress.
- **Policy Programme:** This initiative supports collaborative efforts between the EU and Member States to achieve the established targets, with annual progress reports providing updates.
- **Multi-Country Projects:** Member States can pool resources to launch large-scale, cross-border initiatives.
- **Digital Rights and Principles:** Aligned with EU values, these principles, outlined in the Declaration on Digital Rights and Principles, must be respected within the digital sphere.

Figure 1: Europe's 2030 Digital Decade (adapted by authors)





Origins of the EU AI Act

The Need for Responsible AI Systems

The rapid advancement of General Purpose AI (GPAI) and Generative AI models has opened new frontiers in AI capabilities, transforming fields from healthcare and education to manufacturing and entertainment. While these advancements present significant opportunities, they also bring new risks. Key concerns associated with AI systems include:

1. **Safety Risks:** Malfunctioning AI systems can lead to harm, material or immaterial, including physical, psychological, societal, or economic, particularly in high-stakes sectors like healthcare, automotive, and manufacturing.
2. **Opaque Decision-Making:** Many AI models, especially generative models, operate as “black boxes,” making it difficult for users and regulators to understand or explain decisions.
3. **Privacy Concerns:** AI’s extensive use of personal data can lead to privacy violations if not managed responsibly, raising ethical and legal concerns.
4. **Discrimination:** Biased algorithms can reinforce or even amplify societal inequalities, particularly in contexts like hiring, lending, and criminal justice.
5. **Disinformation:** Generative AI models capable of producing human-like text and images also raise risks around misinformation and deepfakes, threatening public trust and security.

These challenges highlight the need for regulatory intervention to safeguard users and ensure that AI aligns with societal values. Without guidelines or standards, AI applications could risk undermining trust, equity, and democratic norms. The EU's *AI Act* was thus developed to address these risks proactively, setting a global precedent for responsible AI governance. It should be regretted that the *AI Act* excludes from its scope “AI systems are placed on the market, put into service, or used with or without modification of such systems for military, defence or national security purposes”

‘Implementing AI Governance practices helps boards restore trust’, Prof. Ingrid Vasiliu-Feltes, MD MBA

It is imperative for boards and executives to maintain or restore digital trust through the careful orchestration of AI governance, risk mitigation, and cyber-ethics. This demands designing customized AI ethics KPIs and OKRs to ensure accountability, transparency, and sustainable alignment with organizational and societal values.

‘Effective AI governance is non-negotiable for boards’

“Effective AI governance and robust cyber-ethics are non-negotiable for boards and C-suites, ensuring sustainable innovation, mitigating risks, and building trust. These are foundational and essential for navigating the complexities of the digital decade.”

Prof. Ingrid Vasiliu-Feltes, MD MBA, Founder & CEO, Institute for Science, Entrepreneurship and Investments





'Innovation encouraged via mitigation mechanisms', AMLEGALS

The EU AI Act's multi-faceted approach hopes to build a responsible AI integration while upholding the EU's value. The act through its mitigation mechanisms, accountability measures and steps to encourage innovation, aims for a seamless and trustworthy integration of AI. The Act sets a benchmark for AI governance and integration that aligns with ethics, democratic values, safeguards individual rights and fosters public trust.

'Value of regulation lies in protecting institutions' integrity'

"The European Union has welcomed the use of AI but has also recognised the importance of regulating its use to safeguard the integrity of the institutions and promote ethical practices."

Anandaday Misshra, *Founder and Managing Partner*, AMLEGALS



AMLEGALS
STRATEGIC LAWYERING

The EU AI Act: Key Provisions and Objectives

Adopted as a central component of the EU's digital strategy, the *AI Act* provides a comprehensive framework for AI's lifecycle within the EU. This regulation reflects a human-centered approach to AI, emphasizing that AI systems should serve people and promote the well-being of societies. Key provisions of the Act include:

1. **Risk-Based Classification:** The Act categorizes AI systems into different risk levels—unacceptable, high, and low/minimal—based on their potential impact on safety and fundamental rights. Systems deemed "unacceptable," such as those infringing on privacy or perpetuating discrimination, are outright banned. For high-risk applications, particularly in sectors like healthcare, policing, and education, the Act imposes strict safety and transparency standards, following a dedicated approach on what use cases and what regulatory considerations render an application high risk. Conversely, we should not forget the GPAIs with systemic risks. If a high-risk AI system uses an ai model with systemic risks, there would be a cumulation of obligations. Transparency applies to both risk taxonomies.
2. **Transparency Requirements:** AI systems, especially high-risk ones, must disclose relevant information to users, ensuring they are informed about the AI's function, limitations, and any potential risks. This provision aims to demystify AI and empower users with the knowledge they need to make informed decisions.
3. **Quality Standards and Compliance Mechanisms:** High-risk AI systems must meet rigorous quality benchmarks to minimize biases and ensure adequate accuracy. Moreover, the Act provides avenues for individuals to file complaints about AI-related harms, offering a mechanism for recourse and accountability in combination with the AI Liability Directive, which currently undergoes a legislative process. This promotes trust by assuring users that they have the right to challenge AI-based decisions that may adversely affect them.



4. **Guidance and Support for Implementation:** Recognizing the challenges of implementing a regulation as comprehensive as the AI Act, the EU has established an *AI Office* and is working closely with national regulators and stakeholders. These efforts include developing technical standards and guidance documents to aid compliance, particularly for small and medium-sized enterprises (SMEs).
5. **Prohibitions on Certain AI Applications:** AI systems that pose clear threats to safety, livelihoods, or fundamental rights, such as biometric surveillance for public tracking, are prohibited under the Act. This measure addresses public concerns about AI's potential misuse, particularly in state surveillance and personal data exploitation.

National Contributions to Responsible AI Development

The implementation of the *AI Act* relies heavily on cooperation from Member States, and several EU countries have proactively included AI-related strategies in their national Digital Decade roadmaps. For instance, Belgium², Germany³, Greece⁴, the Netherlands⁵, and Sweden⁶ have incorporated measures that promote human-centric and responsible AI systems. These measures support safe and inclusive AI applications across social services, education, and R&D projects, particularly within SMEs.

Such national initiatives align with the broader EU objective of ensuring that AI systems are not only effective but also non-discriminatory and accessible across diverse demographics and sectors.

The *AI Act* also complements the EU's *Declaration on Digital Rights and Principles*, which outlines a vision for digital technologies that respect privacy, fairness, and security. Monitoring efforts at both the EU and national levels ensure that these principles are reflected in AI policies, underscoring a commitment to transparency and accountability. These efforts have already begun to inspire similar legislative initiatives worldwide, with other regions closely examining the EU's experience in AI regulation as a potential model.

Importance of the AI Act for a Human-Centric Digital Future

The *AI Act* is a foundational piece of the EU's digital transformation strategy. By setting clear boundaries and expectations, it helps to build a digital ecosystem where AI technologies are aligned with human rights, safety, and ethical standards. This legislation is especially critical as it provides a counterbalance to the commercial and technical pressures that could otherwise prioritize profit over public welfare.

1. **Public Trust:** In a world where AI applications are becoming part of citizens' daily lives, trust is essential. By establishing clear standards for transparency, quality, and accountability, the *AI Act* aims to foster trust among citizens, helping them feel more confident in their interactions with AI technologies.
2. **Innovation within Boundaries:** The Act promotes responsible innovation by defining a safe and ethical environment for AI development. Through guidelines and transparency measures, companies can innovate while still upholding societal values, positioning the EU as a leader in responsible AI. However, this may then support implementation of trustworthy AI.

² European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: <https://economie.fgov.be/fr/file/7467299/download?token=5laXYJx1> (last accessed 12th January 2025)

³ European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: https://bmdv.bund.de/SharedDocs/DE/Anlage/DG/Digitales/nationaler-fahrplan-zur-digitalen-dekade.pdf?__blob=publicationFile (last accessed 12th January 2025)

⁴ European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: https://digitalstrategy.gov.gr/website/static/website/assets/uploads/digital_decade_national_roadmap.pdf (last accessed 12th January 2025)

⁵ European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: <https://digital-strategy.ec.europa.eu/en/factpages/netherlands-2024-digital-decade-country-report#:~:text=The%20Netherlands%20Digital%20Decade%20strategic,with%20the%20EU%202030%20ambitions>. (last accessed 12th January 2025)

⁶ European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: <https://www.regeringen.se/contentassets/ae6609035b9147238a29c94a0094248f/svensk-nationell-fardplan-for-eus-digitala-decennium.pdf.pdf> (last accessed 12th January 2025)

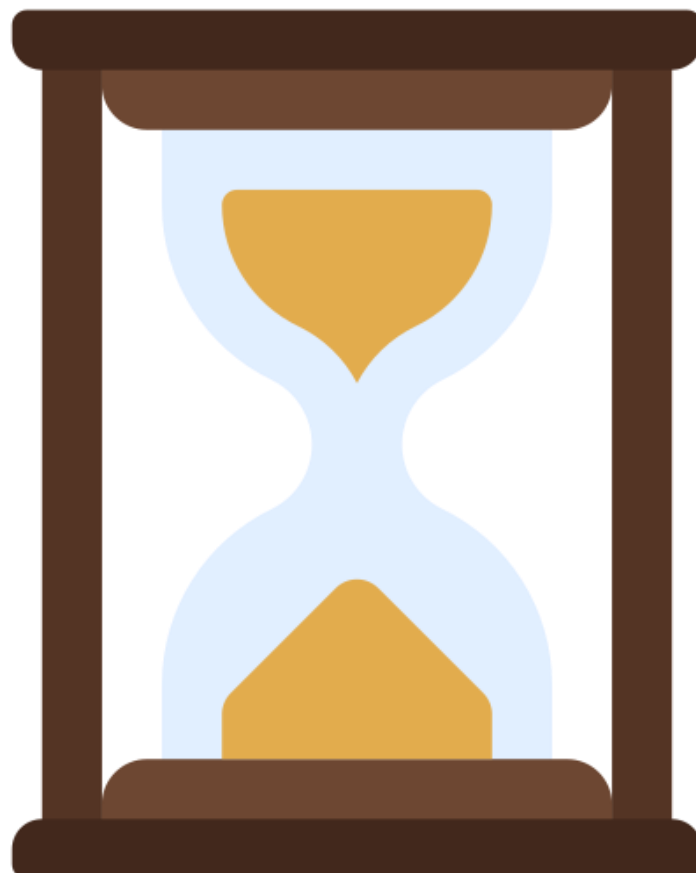


3. **Global Influence:** The AI Act's influence is already visible beyond the EU, with international governments and organizations looking to the Act as a blueprint for their regulatory approaches. This could lead to a more harmonized global approach to AI governance, potentially minimizing conflicts between regional regulations and facilitating the development of safer, interoperable AI systems.

'ISO/IEC 42001:2023 Sets the gold standard for Responsible AI'

"ISO/IEC42001 as the new gold standard to demonstrate responsible AI can support to implement and to manage the focus of human centric design of AI. With the adjustments of affected processes, they can re-organized based on principles of trustworthy AI. This strengthens our path to find trustworthy AI. AI-Auditing will help to achieve this goal."

Ina Schöne, Founder, Data Privacy and AI





3. Understanding the Digital Rights and Principles

The Declaration on Digital Rights and Principles presents the EU's vision for digital transformation. This vision puts people at the centre, in line with EU values and fundamental rights. The Declaration provides a reference framework for citizens and guides the EU and Member States on our journey to digital transformation.

The European Declaration on Digital Rights and Principles promotes a digital transition shaped by European values. The EU wants to empower people to fully enjoy the opportunities that the digital transition is bringing. It has adopted a set of digital rights and principles that reflect EU values and promote a human-centric, secure and sustainable vision for the digital transformation. The Declaration also includes commitments for the EU and Member States to act in a number of digital matters.

The European Declaration on Digital Rights and Principles promotes a digital transition shaped by European values. its shaped around six key themes:

1. Placing people and their rights at the centre of the digital transformation
2. Supporting solidarity and inclusion
3. Ensuring freedom of choice in the digital space (e.g. online).
4. Fostering participation in the digital public space
5. Increasing safety, security and empowerment of individuals (especially young people)
6. Promoting the sustainability of the digital future

Figure 1: Six themes supporting the digital principles

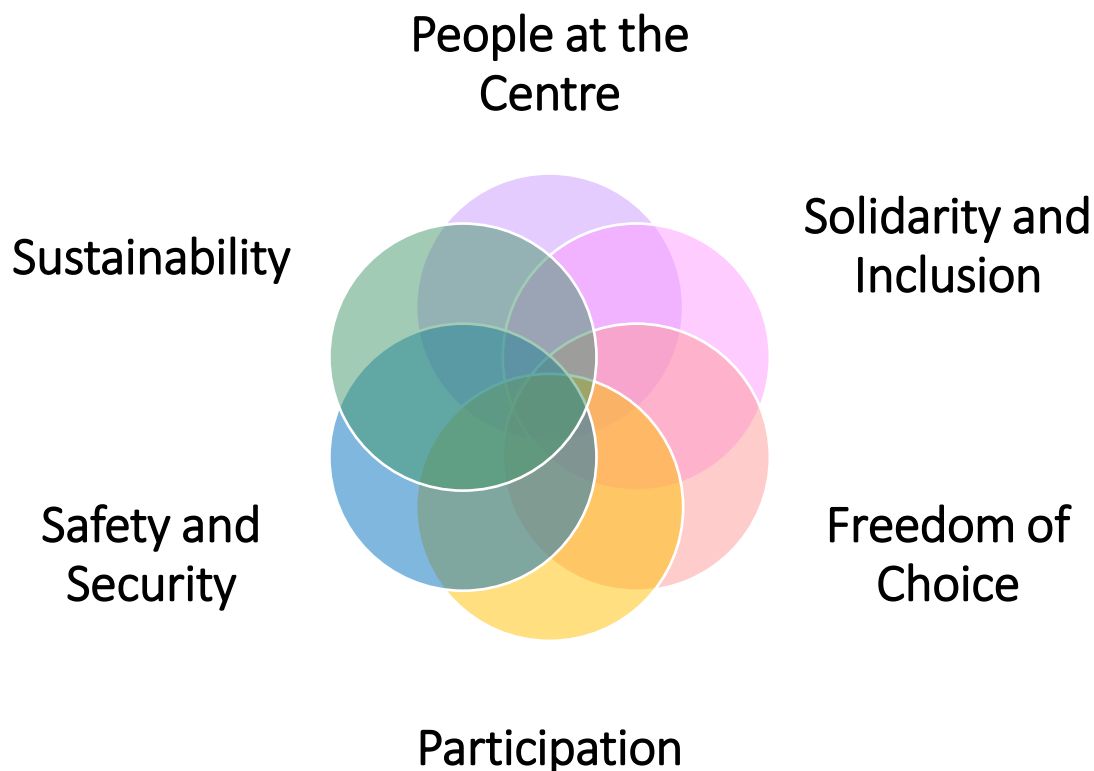




Table 1: Mapping of Digital Principles for the Digital Decade against the EU AI Act

Theme	Guideline	Recital(s)	Article(s)	Supporting
People at the Centre	People at the centre	-	1, 16, 27, 58, 59	-
	Solidarity and Inclusion	-	1, 10, 16, 27, 58, 95	-
Solidarity and Inclusion	Connectivity	-	10, 58, 62	-
	Digital Education, Training and Skills	20, 56	4	-
	Fair and Just Working Conditions (A)	9, 21, 92	16, 27	-
	Fair and Just Working Conditions (B)	9, 92	26, 27	-
	Digital Public Services Online	-	27	Annex III
Freedom of Choice	Interactions with algorithms and artificial intelligence systems (A)	6	1, 4, 14, 58	-
	Interactions with algorithms and artificial intelligence systems (B)	-	1, 13, 14, 27, 50, 86	-
	A fair digital environment (A)	-	1, 13, 14, 50, 86	-
	A fair digital environment (B)	-	1, 57, 58, 62, 63	-
Participation	Participation (A)	-	1, 10, 13, 50, 95	-
	Participation (B)	9, 48, 134	2	-
	Participation (C)	-	1, 13, 50, 71	-
	Participation (D)	118, 120, 133, 134, 136	-	-
Safety and Security	A protected, safe and secure digital environment	-	10, 14, 15, 27, 50, 71, 78	-
	Privacy and individual control over data (A)	69	10, 27, 59, 78	-
	Privacy and individual control over data (B)	69	10, 59, 78	-
	Privacy and individual control over data (C)	69	10, 59, 69	-
	Protection and empowerment of children and young people in the digital environment (A)	9, 20, 48, 56	-	-
	Protection and empowerment of children and young people in the digital environment (B)	9, 48, 56	-	-
	Protection and empowerment of children and young people in the digital environment (C)	9, 48	10, 14, 15	-
Sustainability	Sustainability (A)	27, 142	58, 95, 112	-
	Sustainability (B)	-	95, 112	Annex XI



People at the Centre

People at the centre

1. People are at the centre of the digital transformation in the European Union. Technology should serve and benefit all people living in the EU and empower them to pursue their aspirations, in full security and respect for their fundamental rights.

Ensuring Technology Serves and Benefits People

Article 1: Subject Matter: This article establishes the purpose of the EU AI Act, which is to promote human-centric and trustworthy AI, ensuring a high level of protection for health, safety, and fundamental rights. This aligns with the principle of technology serving and benefiting all people in the EU.

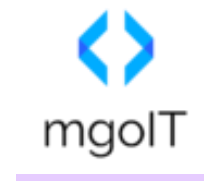
'Bridging the gap between cutting-edge technology and human-centric values', mgolT

The EU AI Act represents a pivotal moment in shaping the future of innovation, accountability, and trust in the digital era. By mandating compliance and ethical AI development, it sets the foundation for a harmonized framework that not only protects citizens but also fosters sustainable growth and global competitiveness. This Act bridges the gap between cutting-edge technology and human-centric values, empowering businesses to innovate responsibly while building societal trust. Contributing to this transformative discourse is both a privilege and a responsibility.

'Human-centricity a hallmark of an inclusive digital future'

"AI must empower society by ensuring human-centric and sustainable applications. The EU AI Act offers a crucial framework to harmonize innovation with ethical values, shaping a secure and inclusive digital future."

Patrick Orsos, Managing Partner, mgolT



Strengthening the Democratic Framework

Article 58: AI Regulatory Sandboxes: This article supports innovation and experimentation in AI development, allowing for collaboration between public and private sectors. It ensures that AI systems are developed in a way that benefits society and aligns with democratic values by facilitating cooperation and regulatory learning.

Ensuring EU Values and Individual Rights

Article 27: Fundamental Rights Impact Assessment: This article requires deployers of high-risk AI systems to assess the impact on fundamental rights, ensuring that AI systems respect individual rights and align with EU values both online and offline.



Fostering Responsible Action by All Actors

Article 16: Obligations of Providers of High-Risk AI Systems: Providers are required to ensure compliance with the regulation, maintain a quality management system, and provide necessary documentation. This fosters responsible action by ensuring providers are accountable for their AI systems.

Promoting the Vision Internationally

Article 59: Further Processing of Personal Data in AI Regulatory Sandboxes: This article outlines the conditions under which personal data can be processed in AI regulatory sandboxes, ensuring that data protection rights are respected and promoting responsible AI development internationally.

Solidarity and Inclusion

Solidarity and Inclusion

Technology should be used to unite, and not divide, people. The digital transformation should contribute to a fair and inclusive society and economy in the EU.

Using Technology to Unite People

Article 1: Subject Matter: This article emphasizes the promotion of human-centric and trustworthy AI, ensuring that AI systems are designed to benefit people and respect their fundamental rights. This aligns with the principle of using technology to unite people by ensuring that AI serves the collective interests of society.

Article 58: AI Regulatory Sandboxes: This article facilitates innovation and collaboration between public and private sectors, allowing for the development of AI systems that are beneficial to society. By fostering cooperation and regulatory learning, it supports the use of technology to unite people and address societal challenges.

Contributing to a Fair and Inclusive Society and Economy

Article 10: Data and Data Governance: This article emphasizes the importance of using high-quality, representative, and unbiased data sets in the development of high-risk AI systems. It mandates practices to detect, prevent, and mitigate biases that could negatively impact fundamental rights or lead to discrimination, thereby promoting fairness and inclusivity.

'Unbiased data is a misnomer'

"I believe that unbiased data is a misnomer, I do not think we can prevent bias as humans are intrinsically biased and all our data comes from humans. We need to identify, classify and use bias correctly within our data. "There is no capability today to create high quality data sets for use with ethical emotional AI. There needs to be vetted businesses that can create training data for ethical usage taking real data from vulnerable classes such as children, those affected by crime etc and making it safe to use for training AI."

Heather Payne, Founder & CEO, Toast91



toast91



Article 27: Fundamental Rights Impact Assessment: Deployers of high-risk AI systems must conduct an assessment of the impact on fundamental rights, ensuring that AI systems do not adversely affect vulnerable groups and that their deployment considers the broader societal context. This aligns with the goal of fostering an inclusive society.

Article 95: Codes of Conduct for Voluntary Application of Specific Requirements: This article encourages the development of codes of conduct that promote inclusive and diverse design of AI systems. It suggests involving stakeholders, including civil society organizations and academia, in the development process to ensure diverse perspectives are considered, supporting a fair and inclusive economy.

Supporting Economic Inclusivity

Article 16: Obligations of Providers of High-Risk AI Systems: Providers are required to ensure compliance with the regulation, maintain a quality management system, and provide necessary documentation. This fosters responsible action by ensuring providers are accountable for their AI systems, which includes ensuring accessibility for all users.

Connectivity

Everyone, everywhere in the EU, should have access to affordable and high-speed digital connectivity.

Supporting Solidarity and Inclusion

Article 58: AI Regulatory Sandboxes: This article facilitates innovation and collaboration between public and private sectors, allowing for the development of AI systems that can enhance digital connectivity. By fostering cooperation and regulatory learning, it supports the creation of technologies that can improve access to digital services across the EU.

Article 62: Measures for Providers and Deployers, Particularly SMEs: This article emphasizes providing SMEs, including start-ups, with priority access to AI regulatory sandboxes. It also includes organizing awareness-raising and training activities tailored to the needs of SMEs. By supporting SMEs, the article indirectly contributes to the development of affordable digital solutions that can enhance connectivity and inclusion.

Ensuring Access to Digital Connectivity

While the EU AI Act primarily focuses on the regulation of AI systems, its provisions indirectly support the broader goal of digital connectivity by promoting innovation and ensuring that AI systems are developed in a way that benefits society. The emphasis on collaboration, innovation, and support for SMEs can lead to advancements in digital technologies that improve connectivity.

Promoting Fair and Inclusive Society

Article 10: Data and Data Governance: This article ensures that high-risk AI systems use high-quality, representative, and unbiased data sets. By promoting fairness and inclusivity in AI systems, it supports the development of technologies that can be accessible to all, including those in underserved areas.

Digital Education, Training and Skills

Everyone has the right to education, training and lifelong learning and should be able to acquire all basic and advanced digital skills.



Right to Education, Training, and Lifelong Learning

Recital 56: This recital highlights the importance of AI systems in promoting high-quality digital education and training. It emphasizes the need for learners and teachers to acquire necessary digital skills and competences, including media literacy and critical thinking, to actively participate in the economy and society. It also notes that AI systems used in education should be classified as high-risk due to their potential impact on individuals' educational and professional paths.

Acquiring Basic and Advanced Digital Skills

Article 4: AI Literacy: This article requires providers and deployers of AI systems to ensure a sufficient level of AI literacy among their staff and other persons involved in the operation and use of AI systems. This includes considering their technical knowledge, experience, education, and training, which indirectly supports the development of digital skills related to AI.

Recital 20: This recital discusses the importance of AI literacy in equipping providers, deployers, and affected persons with the necessary knowledge to make informed decisions regarding AI systems. It emphasizes the need for understanding technical elements, interpreting AI outputs, and understanding the impact of AI-assisted decisions, which contributes to digital skills acquisition.

‘Data & AI Literacy support responsible AI practices’

“For the AI Act unfolding its impact, data and AI literacy is required – rooted in knowledge about responsible AI, fused with practical experience in implementing innovative use cases that benefit organizations, businesses and society.”

Martin Heitmann, *Guiding Teams to Success | Fostering Industry Best Practices | Enabling Innovation in Pharma & Healthcare*



Fair and Just Working Conditions (A)

Everyone has the right to fair, just, healthy and safe working conditions and appropriate protection in the digital environment as in the physical work place, regardless of their employment status, modality or duration.

Fair, Just, Healthy, and Safe Working Conditions

Article 16: Obligations of Providers of High-Risk AI Systems: This article requires providers to ensure compliance with the regulation, maintain a quality management system, and provide necessary documentation. These obligations help ensure that AI systems used in workplaces are safe and reliable, indirectly supporting healthy working conditions.



Article 27: Fundamental Rights Impact Assessment: Deployers of high-risk AI systems must assess the impact on fundamental rights, which includes considering the implications for workers' rights and ensuring that AI systems do not lead to unfair or unsafe working conditions.

Appropriate Protection in the Digital Environment

Recital 9: This recital emphasizes that the regulation should not affect existing rights and remedies related to employment and working conditions, including health and safety at work. It highlights the importance of maintaining protections for workers in the digital environment, similar to those in the physical workplace.

Recital 92: This recital underscores the necessity of informing workers and their representatives about the deployment of high-risk AI systems in the workplace. It ensures that workers are aware of AI systems that may affect their working conditions, thereby supporting transparency and protection.

Inclusivity Regardless of Employment Status

Recital 21: This recital ensures that the rules established by the regulation apply in a non-discriminatory manner to all providers and deployers of AI systems, irrespective of their location, supporting inclusivity and fairness in the digital environment.

Fair and Just Working Conditions (B)

Trade unions and employers' organisations play an important role in the digital transformation, particularly in relation to the definition of fair and just working conditions, including with regard to the use of digital tools at work.

Role of Trade Unions and Employers' Organizations

Article 26: Obligations of Deployers of High-Risk AI Systems: This article requires deployers to inform workers and their representatives, which includes trade unions, about the use of high-risk AI systems in the workplace. This ensures transparency and allows trade unions to play a role in overseeing the implementation of AI systems, ensuring they align with fair working conditions.

Recital 92: This recital emphasizes the necessity for employers to inform and consult workers or their representatives, including trade unions, about decisions to deploy AI systems. It highlights the importance of involving these organizations in discussions about AI deployment to protect workers' rights and ensure fair working conditions.

Definition of Fair and Just Working Conditions

Article 27: Fundamental Rights Impact Assessment: Deployers of high-risk AI systems must assess the impact on fundamental rights, including workers' rights. This assessment helps ensure that AI systems do not lead to unfair or unsafe working conditions, aligning with the principle of defining fair and just working conditions.

Recital 9: This recital underscores that the regulation should not affect existing rights and remedies related to employment and working conditions, including health and safety at work. It reinforces the need to maintain protections for workers in the digital environment, similar to those in the physical workplace.

Digital Public Services Online

Everyone should have online access to key public services in the EU. Nobody is to be asked to provide data more often than necessary when accessing and using digital public services.



Online Access to Key Public Services

Annex III: High-Risk AI Systems: This annex includes AI systems used by public authorities to evaluate eligibility for essential public services and benefits, such as healthcare. It highlights the importance of ensuring these systems are accessible and fair, aligning with the principle of providing online access to key public services.

Minimizing Data Requests

While the EU AI Act does not directly address the principle of minimizing data requests in the context of digital public services, it emphasizes data governance and protection:

Article 27: Fundamental Rights Impact Assessment: This article requires deployers of high-risk AI systems to assess the impact on fundamental rights, which can include ensuring that AI systems used in public services do not infringe on individuals' rights and are accessible to all. This indirectly supports the principle of minimizing unnecessary data requests by ensuring that data collection practices respect fundamental rights.

For specific provisions related to data minimization, it would be more relevant to refer to the General Data Protection Regulation (GDPR), which includes principles of data minimization, requiring that personal data collected be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

Freedom of Choice

Interactions with algorithms and artificial intelligence systems (A)

Artificial intelligence should serve as a tool for people, with the ultimate aim of increasing human well-being.

AI as a Tool for Human Well-being

Article 1: Subject Matter: This article establishes the purpose of the EU AI Act, which is to promote the uptake of human-centric and trustworthy AI while ensuring a high level of protection for health, safety, and fundamental rights. This aligns with the principle of AI serving as a tool for people by prioritizing human well-being and safeguarding against harmful effects.

Ensuring Safety and Fundamental Rights

Article 14: Human Oversight: This article mandates that high-risk AI systems be designed to allow effective human oversight. The oversight aims to prevent or minimize risks to health, safety, or fundamental rights, ensuring that AI systems enhance human well-being rather than compromise it.

Supporting Innovation and Accessibility

Article 58: AI Regulatory Sandboxes: By facilitating innovation and collaboration, AI regulatory sandboxes support the development of AI systems that can enhance societal well-being. These sandboxes allow for testing and refining AI technologies in a controlled environment, ensuring they are safe and effective before widespread deployment.

Promoting Education and Digital Skills

Article 4: AI Literacy: This article emphasizes the importance of AI literacy among providers and deployers, ensuring that those involved in the operation and use of AI systems have the necessary skills and knowledge. This focus on education supports the responsible use of AI as a tool for enhancing human capabilities and well-being.



Ethical and Human-Centric AI

Recital 6: This recital underscores the importance of developing AI in accordance with Union values, emphasizing that AI should be a human-centric technology serving as a tool for people, with the ultimate aim of increasing human well-being

Interactions with algorithms and artificial intelligence systems (B)

Everyone should be empowered to benefit from the advantages of algorithmic and artificial intelligence systems including by making their own, informed choices in the digital environment, while being protected against risks and harm to one's health, safety and fundamental rights.

Empowering Informed Choices

Article 50: Transparency Obligations for Providers and Deployers of Certain AI Systems: This article mandates that providers ensure AI systems intended to interact with natural persons are designed to inform users that they are interacting with an AI system. This transparency is crucial for empowering individuals to make informed choices during their interactions with AI.

Article 13: Transparency and Provision of Information to Deployers: High-risk AI systems must be designed to ensure sufficient transparency, enabling deployers to interpret and use the system's output appropriately. This includes providing clear instructions for use, which helps users understand the system's capabilities and limitations, thereby supporting informed decision-making.

Article 86: Right to Explanation of Individual Decision-Making: This article provides individuals affected by decisions made using high-risk AI systems the right to obtain clear and meaningful explanations of the role of the AI system in the decision-making process. This ensures that individuals can understand how AI systems influence decisions that affect them, empowering them to make informed choices.

Protection Against Risks and Harm

Article 1: Subject Matter: This article establishes the purpose of the EU AI Act, which is to ensure a high level of protection for health, safety, and fundamental rights against the harmful effects of AI systems. This aligns with the principle of safeguarding individuals in their interactions with AI.

Article 14: Human Oversight: This article mandates that high-risk AI systems be designed to allow effective human oversight, aiming to prevent or minimize risks to health, safety, or fundamental rights. This ensures that AI systems are used in a manner that protects individuals from potential harm.

Article 27: Fundamental Rights Impact Assessment: Deployers of high-risk AI systems must assess the impact on fundamental rights, ensuring that AI systems do not infringe on these rights and are used responsibly. This assessment helps identify and mitigate risks associated with AI interactions.

A fair digital environment (A)

Everyone should be able to effectively and freely choose which online services to use, based on objective, transparent, easily accessible and reliable information.

Ensuring Transparency and Informed Choices

Article 50: Transparency Obligations for Providers and Deployers of Certain AI Systems: This article mandates that AI systems intended to interact with natural persons must inform users that they are interacting with an AI system. This transparency is crucial for empowering individuals to make informed choices during their interactions with AI. Additionally, AI systems that generate synthetic content must be marked as such, ensuring users are aware of the nature of the content they are engaging with.



Article 13: Transparency and Provision of Information to Deployers: High-risk AI systems must be designed to ensure sufficient transparency, enabling deployers to interpret and use the system's output appropriately. This includes providing clear instructions for use, which helps users understand the system's capabilities and limitations, thereby supporting informed decision-making.

Protection Against Risks and Harm

Article 1: Subject Matter: This article establishes the purpose of the EU AI Act, which is to ensure a high level of protection for health, safety, and fundamental rights against the harmful effects of AI systems. This aligns with the principle of safeguarding individuals in their interactions with AI, ensuring that they can choose services without compromising their rights.

Article 14: Human Oversight: This article mandates that high-risk AI systems be designed to allow effective human oversight, aiming to prevent or minimize risks to health, safety, or fundamental rights. This ensures that AI systems are used in a manner that protects individuals from potential harm, allowing them to make choices based on reliable information.

Empowering Informed Choices

Article 86: Right to Explanation of Individual Decision-Making: This article provides individuals affected by decisions made using high-risk AI systems the right to obtain clear and meaningful explanations of the role of the AI system in the decision-making process. This ensures that individuals can understand how AI systems influence decisions that affect them, empowering them to make informed choices.

A fair digital environment (B)

Everyone should have the possibility to compete fairly and innovate in the digital environment. This should also benefit businesses, including SMEs.

Supporting Fair Competition and Innovation

Article 62: Measures for Providers and Deployers, in Particular SMEs: This article outlines specific actions to support SMEs, including start-ups, by providing them with priority access to AI regulatory sandboxes. It also emphasizes organizing awareness-raising and training activities tailored to the needs of SMEs. These measures help level the playing field by ensuring that smaller businesses have the resources and opportunities to innovate and compete effectively in the digital environment.

Article 57: AI Regulatory Sandboxes: AI regulatory sandboxes are designed to foster innovation by providing a controlled environment for the development, testing, and validation of AI systems. They facilitate the sharing of best practices and regulatory learning, which can help SMEs and other businesses navigate the regulatory landscape more effectively. This contributes to fair competition by allowing businesses of all sizes to experiment and innovate without the immediate pressure of full regulatory compliance.

Article 58: Detailed Arrangements for AI Regulatory Sandboxes: This article ensures that AI regulatory sandboxes are accessible to all eligible providers, including SMEs, and that participation is free of charge for these smaller entities. By reducing financial barriers and providing a supportive environment, the sandboxes encourage innovation and help SMEs compete on a more equal footing with larger companies.



Facilitating Market Access and Reducing Barriers

Article 1: Subject Matter: The overarching goal of the EU AI Act is to promote the uptake of human-centric and trustworthy AI while ensuring a high level of protection for health, safety, and fundamental rights. By establishing harmonized rules and supporting innovation, the Act aims to improve the functioning of the internal market, which benefits all businesses, including SMEs, by creating a more predictable and stable regulatory environment.

Article 63: Derogations for Specific Operators: This article allows microenterprises to comply with certain elements of the quality management system in a simplified manner, provided they meet specific criteria. This flexibility helps reduce the regulatory burden on smaller businesses, enabling them to focus more on innovation and market competition.

Participation

Participation (A)

Everyone should have access to a trustworthy, diverse and multilingual digital environment. Access to diverse content contributes to a pluralistic public debate and effective participation in democracy in a non-discriminatory manner.

Trustworthy Digital Environment

Article 1: Subject Matter: The EU AI Act aims to promote the uptake of human-centric and trustworthy AI, ensuring a high level of protection for health, safety, and fundamental rights. This aligns with the principle of creating a trustworthy digital environment by establishing harmonized rules for AI systems.

Article 50: Transparency Obligations: This article mandates transparency for AI systems, ensuring that users are informed about their interactions with AI. This transparency is crucial for building trust in digital environments, which is essential for a trustworthy digital space.

Diverse Digital Environment

Article 95: Codes of Conduct: This article encourages the development of codes of conduct that promote inclusive and diverse design of AI systems. It suggests involving stakeholders, including civil society organizations and academia, to ensure diverse perspectives are considered, supporting a diverse digital environment.

Multilingual Digital Environment

While the EU AI Act does not specifically address multilingualism, its emphasis on inclusivity and accessibility can indirectly support multilingual digital environments by ensuring that AI systems are designed to be accessible to diverse user groups.

Supporting Pluralistic Public Debate and Democracy

Article 13: Transparency and Provision of Information to Deployers: High-risk AI systems must provide clear instructions and information about their capabilities and limitations. This ensures that users and stakeholders can understand and critically assess the role of AI in decision-making processes, fostering a more informed and engaged public.

Article 10: Data and Data Governance: This article emphasizes the use of high-quality, representative, and unbiased data sets in AI systems. By preventing and mitigating biases, the Act ensures that AI systems do not perpetuate discrimination, thereby supporting fair and equal participation in democratic processes.



‘Alignment with European Values critical to Ethical AI Development’

“As a firm committed to ethical AI development, we recognize the EU AI Act as a pivotal framework. It aligns with European values such as democracy, human rights, and sustainability while ensuring the trustworthy development of AI. By categorizing risks, mandating oversight, and prohibiting harmful practices, the Act safeguards society. This comprehensive regulation establishes global standards for ethical AI, striking a balance between innovation and accountability.”

Binesh Balan, Managing Director, Arkstons Advisory



Participation (B)

Everyone has the right to freedom of expression and information, as well as freedom of assembly and of association in the digital environment.

Freedom of Expression and Information

Recital 48: This recital highlights the importance of protecting fundamental rights, including freedom of expression and information, when classifying AI systems as high-risk. It underscores the need to consider these rights in the context of AI systems' potential adverse impacts, ensuring that AI technologies do not infringe upon these freedoms.

Recital 134: This recital addresses the transparency obligations related to AI-generated content, such as deep fakes, ensuring that such content is clearly labeled. This transparency is crucial for maintaining freedom of expression and information by allowing users to discern the nature of the content they are engaging with, thus supporting informed public discourse.

Freedom of Assembly and Association

Recital 48: In addition to freedom of expression, this recital also emphasizes the protection of freedom of assembly and association as fundamental rights that must be considered when assessing the risks associated with AI systems. This ensures that AI technologies do not hinder these freedoms, particularly in digital spaces where assembly and association increasingly occur.

General Provisions Supporting Digital Rights

Article 2: Scope: This article clarifies that the regulation applies to AI systems within the EU, ensuring that the rights and freedoms of individuals, including those related to expression, assembly, and association, are protected in the digital environment.

Recital 9: This recital reinforces that the regulation should not affect the exercise of fundamental rights, including the right to strike or take collective action, which are integral to freedom of assembly and association. It ensures that AI systems do not undermine these rights in the digital space.

Participation (C)

Everyone should be able to access information on who owns or controls the media services they are using.



Transparency and Accountability

Article 50: Transparency Obligations for Providers and Deployers of Certain AI Systems: This article mandates that providers ensure AI systems intended to interact with natural persons are designed to inform users that they are interacting with an AI system. This transparency is essential for users to understand the nature of the content and services they are engaging with, which indirectly supports the principle of knowing who controls the media services.

Article 13: Transparency and Provision of Information to Deployers: High-risk AI systems must provide clear instructions and information about their capabilities and limitations. This includes details about the system's provider, which can help users identify the entities behind the media services they are using. Such transparency is crucial for accountability and understanding media ownership.

Supporting Information Access

Article 71: EU Database for High-Risk AI Systems: This article establishes a database containing information about high-risk AI systems, including details about the provider. This database can serve as a resource for users seeking information about the entities controlling the AI systems behind media services.

General Provisions

Article 1: Subject Matter: The EU AI Act aims to promote human-centric and trustworthy AI, ensuring a high level of protection for fundamental rights. This includes transparency and accountability, which are essential for users to access information about media ownership and control.

Participation (D)

Online platforms, particularly very large online platforms, should support free democratic debate online. Given the role of their services in shaping public opinion and discourse, very large online platforms should mitigate the risks stemming from the functioning and use of their services, including in relation to misinformation and disinformation campaigns, and protect freedom of expression.

Supporting Free Democratic Debate

Recital 120: This recital highlights the obligations of providers of very large online platforms to identify and mitigate systemic risks arising from the dissemination of content that is artificially generated or manipulated. This includes addressing risks to democratic processes, civic discourse, and electoral processes, which are crucial for supporting free democratic debate.

Recital 136: It emphasizes the importance of transparency in AI-generated content, ensuring that such content is clearly labeled. This transparency helps maintain the integrity of public discourse by allowing users to discern the nature of the content they are engaging with, thus supporting informed democratic debate.

Mitigating Risks from Misinformation and Disinformation

Recital 118: This recital discusses the risk-management framework for very large online platforms, which includes assessing potential systemic risks from the design and use of their services. It underscores the need for these platforms to take appropriate measures to mitigate risks, including those related to misinformation and disinformation, while observing fundamental rights.

Recital 133: It addresses the challenges posed by AI systems that generate synthetic content, which can impact the integrity and trust in the information ecosystem. The recital calls for technical solutions to mark AI-generated content, helping to mitigate risks of misinformation and manipulation.



Protecting Freedom of Expression

Recital 134: This recital clarifies that compliance with transparency obligations for AI-generated content should not impede the right to freedom of expression. It ensures that while content is labeled for transparency, the rights to freedom of expression and the arts are preserved, particularly in creative and satirical contexts.

Safety and Security

A protected, safe and secure digital environment

Everyone should have access to digital technologies, products and services that are by design safe, secure, and privacyprotective, resulting in a high level of confidentiality, integrity, availability and authenticity of the information processed.

Safety and Security

Article 15: Accuracy, Robustness, and Cybersecurity: This article mandates that high-risk AI systems achieve an appropriate level of accuracy, robustness, and cybersecurity throughout their lifecycle. It emphasizes resilience against errors and unauthorized access, which is crucial for ensuring the security of digital technologies.

Article 14: Human Oversight: This article ensures that high-risk AI systems are designed to allow effective human oversight, aiming to prevent or minimize risks to health, safety, or fundamental rights. This provision supports the safe deployment of AI technologies.

Privacy-Protective Design

Article 10: Data and Data Governance: This article outlines requirements for the quality and governance of data used in high-risk AI systems, emphasizing the need for data sets to be relevant, representative, and free of errors. It also highlights the importance of data protection and privacy in the design and deployment of AI systems.

Article 27: Fundamental Rights Impact Assessment: Deployers of high-risk AI systems must assess the impact on fundamental rights, including privacy. This assessment ensures that AI systems are designed and used in a manner that respects individuals' privacy rights.

Confidentiality, Integrity, Availability, and Authenticity

Article 78: Confidentiality: This article mandates that the Commission, market surveillance authorities, and other involved parties respect the confidentiality of information and data obtained during their tasks. It specifically protects intellectual property rights, trade secrets, and other sensitive information, ensuring that such data is not disclosed improperly.

Article 71: EU Database for High-Risk AI Systems: This article establishes an EU database containing information about high-risk AI systems, ensuring that relevant information is accessible and publicly available in a user-friendly manner. This supports the availability of information necessary for transparency and accountability.

Article 50: Transparency Obligations: This article requires that AI systems generating synthetic content disclose that the content is artificially generated or manipulated. This ensures the authenticity of information by making users aware of the nature of the content they are interacting with.

Privacy and individual control over data (A)

Everyone has the right to privacy and to the protection of their personal data. The latter right includes the control by individuals on how their personal data are used and with whom they are shared.



Privacy and Data Protection

Article 10: Data and Data Governance: This article outlines the requirements for data used in high-risk AI systems, emphasizing the need for data sets to be relevant, representative, and free of errors. It highlights the importance of data protection and privacy, ensuring that personal data is processed with appropriate safeguards.

Article 27: Fundamental Rights Impact Assessment: Deployers of high-risk AI systems must assess the impact on fundamental rights, including privacy. This assessment ensures that AI systems are designed and used in a manner that respects individuals' privacy rights.

Recital 69: This recital emphasizes the principles of data minimization and data protection by design and by default, which are applicable when personal data are processed. It highlights measures such as anonymization and encryption to ensure privacy throughout the AI system's lifecycle.

Control Over Personal Data

Article 59: Further Processing of Personal Data in AI Regulatory Sandboxes: This article specifies conditions under which personal data can be processed in AI regulatory sandboxes, ensuring that such processing is lawful and respects data protection principles. It includes measures to protect personal data and ensure it is deleted once the sandbox participation ends, thereby giving individuals control over their data.

Article 59, Paragraph 1(e): This provision ensures that personal data created in the sandbox cannot be shared outside the sandbox, reinforcing the control individuals have over their data by restricting unauthorized sharing.

Confidentiality and Security

Article 78: Confidentiality: This article mandates that the Commission, market surveillance authorities, and other involved parties respect the confidentiality of information and data obtained during their tasks. It protects intellectual property rights, trade secrets, and other sensitive information, ensuring that such data is not disclosed improperly.

Privacy and individual control over data (B)

Everyone has the right to the confidentiality of their communications and the information on their electronic devices, and not to be subjected to unlawful online surveillance, unlawful pervasive tracking or interception measures.

Confidentiality of Communications and Information

Article 78: Confidentiality: This article mandates that the Commission, market surveillance authorities, and other involved parties respect the confidentiality of information and data obtained during their tasks. It ensures the protection of sensitive information, including intellectual property and trade secrets, which indirectly supports the confidentiality of communications and information on electronic devices.

Protection Against Unlawful Surveillance and Tracking

Article 10: Data and Data Governance: This article emphasizes the importance of data protection and privacy, ensuring that personal data is processed with appropriate safeguards. It highlights the need for data sets to be relevant, representative, and free of errors, which is crucial for maintaining confidentiality and protecting against unlawful surveillance and tracking **2**.

Article 59: Further Processing of Personal Data: This article specifies conditions for processing personal data in AI regulatory sandboxes, ensuring that such processing respects data protection principles and



gives individuals control over their data. This provision helps prevent unauthorized access and misuse of personal data.

General Provisions Supporting Privacy and Security

Recital 69: This recital emphasizes the principles of data minimization and data protection by design and by default, which are applicable when personal data are processed. It highlights measures such as anonymization and encryption to ensure privacy throughout the AI system's lifecycle.

Privacy and individual control over data (C)

Everyone should be able to determine their digital legacy, and decide what happens with their personal accounts and information that concerns them after their death.

Privacy and Data Protection

Article 10: Data and Data Governance: This article emphasizes the importance of data protection and privacy, ensuring that personal data is processed with appropriate safeguards. While it does not specifically address digital legacy, the focus on data governance and protection aligns with the broader goal of allowing individuals to control their personal data.

Article 59: Further Processing of Personal Data: This article specifies conditions for processing personal data in AI regulatory sandboxes, ensuring that such processing respects data protection principles. It includes measures to protect personal data and ensure it is deleted once the sandbox participation ends, which indirectly supports the control over personal data.

General Provisions Supporting Privacy and Security

Recital 69: This recital emphasizes the principles of data minimization and data protection by design and by default, which are applicable when personal data are processed. It highlights measures such as anonymization and encryption to ensure privacy throughout the AI system's lifecycle, indirectly supporting the management of digital legacy.

Protection and empowerment of children and young people in the digital environment (A)

Children and young people should be empowered to make safe and informed choices and express their creativity in the digital environment.

Empowerment and Safe Choices

Recital 48: This recital highlights the importance of considering children's specific rights and vulnerabilities, as enshrined in Article 24 of the Charter and the United Nations Convention on the Rights of the Child, particularly in the digital environment. It emphasizes the need for protection and care necessary for their well-being, which aligns with empowering children to make safe choices.

Recital 20: This recital discusses the importance of AI literacy, which includes equipping individuals with the necessary knowledge to make informed decisions regarding AI systems. While it is not specific to children, promoting AI literacy can indirectly support young people in navigating digital environments safely.

Expressing Creativity

Recital 56: This recital addresses the deployment of AI systems in education, emphasizing the promotion of high-quality digital education and training. It highlights the importance of acquiring digital skills and competences, including media literacy and critical thinking, which are essential for young people to express their creativity in the digital environment.



General Provisions Supporting Safety and Empowerment

Recital 9: This recital underscores that the regulation should not affect existing rights related to the protection of minors, taking into account the UNCRC General Comment No 25 on children's rights in the digital environment. This supports the broader goal of ensuring a safe and empowering digital space for children and young people.

Protection and empowerment of children and young people in the digital environment (B)

Age-appropriate materials and services should improve experiences, well-being and participation of children and young people in the digital environment.

Safety and Empowerment for Children and Young People

Recital 48: This recital highlights the importance of considering children's specific rights and vulnerabilities, as enshrined in Article 24 of the Charter and the United Nations Convention on the Rights of the Child. It emphasizes the need for protection and care necessary for their well-being, which aligns with providing age-appropriate materials and services.

Recital 56: This recital addresses the deployment of AI systems in education, emphasizing the promotion of high-quality digital education and training. It highlights the importance of acquiring digital skills and competences, including media literacy and critical thinking, which are essential for young people to safely navigate and benefit from digital environments.

General Provisions Supporting Safety and Empowerment

Recital 9: This recital underscores that the regulation should not affect existing rights related to the protection of minors, taking into account the UNCRC General Comment No 25 on children's rights in the digital environment. This supports the broader goal of ensuring a safe and empowering digital space for children and young people.

Protection and empowerment of children and young people in the digital environment (C)

Specific attention should be paid to the right of children and young people to be protected from all crimes, committed via or facilitated through digital technologies.

Protection Against Digital Crimes

Recital 48: This recital emphasizes the importance of considering children's specific rights and vulnerabilities, as enshrined in Article 24 of the Charter and the United Nations Convention on the Rights of the Child. It highlights the need for protection and care necessary for their well-being, which includes safeguarding against digital crimes.

Ensuring Safety and Security

Article 15: Accuracy, Robustness, and Cybersecurity: This article mandates that high-risk AI systems achieve an appropriate level of accuracy, robustness, and cybersecurity throughout their lifecycle. This is crucial for ensuring that AI systems do not become tools for committing crimes against children and young people.

Article 14: Human Oversight: This article ensures that high-risk AI systems are designed to allow effective human oversight, aiming to prevent or minimize risks to health, safety, or fundamental rights. This oversight is essential for detecting and preventing potential misuse of AI systems in committing digital crimes.



Data Protection and Privacy

Article 10: Data and Data Governance: This article outlines the requirements for data used in high-risk AI systems, emphasizing the need for data protection and privacy. It ensures that personal data, especially that of children, is processed with appropriate safeguards, reducing the risk of exploitation through digital technologies.

‘AI’s wisdom bounded by quality of data’

“AI integrity is not just about the technology we build, but the values we embed within it—ensuring that its purpose serves humanity with fairness, transparency, and accountability. Following these values the quality of data is the foundation of AI’s wisdom, while synthetic data is the bridge that extends its possibilities—together, they shape the depth and breadth of intelligent systems and have a need to be monitored.”

Michael Boevink, Founder, Boevink Group



General Provisions Supporting Safety

Recital 9: This recital underscores that the regulation should not affect existing rights related to the protection of minors, taking into account the UNCRC General Comment No 25 on children’s rights in the digital environment. This supports the broader goal of ensuring a safe digital space for children and young people.

Sustainability

Sustainability (A)

To avoid significant harm to the environment and to promote a circular economy, digital products and services should be designed, produced, used, repaired, recycled and disposed of in a way that mitigates their negative impact on the environment and on society and avoids premature obsolescence.

Environmental Sustainability

Article 112: Evaluation and Review: This article mandates the European Commission to review the progress on the development of standardization deliverables related to the energy-efficient development of general-purpose AI models. It assesses the need for further measures or actions, including binding measures, to enhance environmental sustainability. This provision supports the design and production of AI systems in a way that minimizes environmental harm.

Article 95: Codes of Conduct: This article encourages the development of codes of conduct that include assessing and minimizing the impact of AI systems on environmental sustainability. It highlights the importance of energy-efficient programming and techniques for the efficient design, training, and use of AI systems, which aligns with the principle of promoting a circular economy.



Supporting Innovation and Sustainability

Article 58: AI Regulatory Sandboxes: These sandboxes facilitate the development of tools and infrastructure for testing and assessing AI systems, including measures to mitigate risks to fundamental rights and society at large, which can encompass environmental considerations. This supports the sustainable use and development of AI technologies.

Recitals Supporting Sustainability

Recital 27: This recital emphasizes that AI systems should be developed and used in a sustainable and environmentally friendly manner, benefiting all human beings while monitoring and assessing long-term impacts on individuals, society, and democracy. It encourages stakeholders to consider ethical principles for developing voluntary best practices and standards.

Recital 142: This recital encourages Member States to support and promote research and development of AI solutions that are socially and environmentally beneficial, such as those that increase accessibility, tackle socio-economic inequalities, or meet environmental targets. It highlights the importance of interdisciplinary cooperation in achieving these goals.

Sustainability (B)

Everyone should have access to accurate, easy-to-understand information on the environmental impact and energy consumption of digital products and services, their reparability and lifetime, allowing them to make responsible choices.

Environmental Impact and Energy Consumption

Article 112: Evaluation and Review: This article mandates the European Commission to review the progress on the development of standardization deliverables related to the energy-efficient development of general-purpose AI models. It assesses the need for further measures or actions to enhance environmental sustainability, which includes evaluating the energy consumption of AI systems.

Annex XI: Technical Documentation for Providers of General-Purpose AI Models: This annex requires providers to include information on the known or estimated energy consumption of the model in their technical documentation. This provision ensures that information about energy consumption is documented and can be made available to relevant authorities, supporting transparency.

Supporting Sustainability

Article 95: Codes of Conduct: This article encourages the development of codes of conduct that include assessing and minimizing the impact of AI systems on environmental sustainability. It highlights the importance of energy-efficient programming and techniques for the efficient design, training, and use of AI systems, aligning with the principle of providing information on environmental impacts.

Reparability and Lifetime

While the EU AI Act does not directly address the reparability and lifetime of digital products and services, its focus on sustainability and transparency indirectly supports these aspects by encouraging practices that consider the long-term impact and efficiency of AI systems.



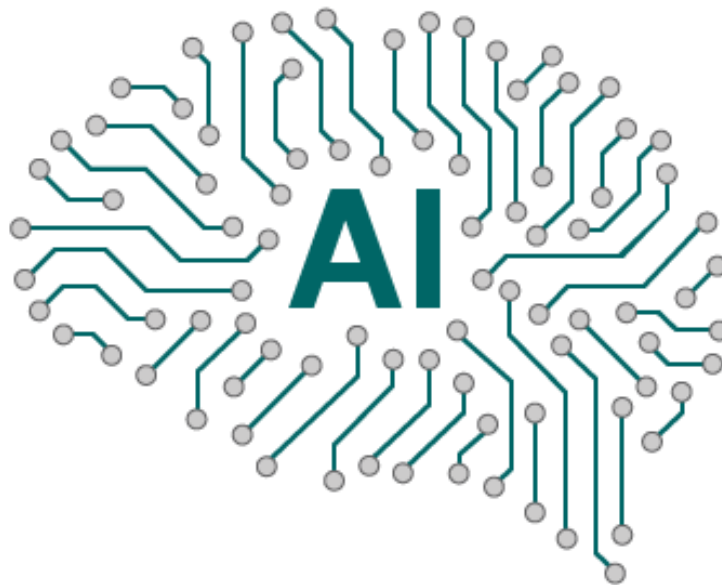
'AI infrastructure needs to address sustainability issues with hardware lifecycle management', leafcloud

While the EU AI Act emphasizes software-level sustainability, it overlooks critical infrastructure impacts. Real sustainability in AI requires addressing hardware lifecycle management, heat reuse, and data center efficiency. The current 2 to 4-year hardware replacement cycle, inherent data center energy waste, and increasing compute demands create significant environmental challenges that efficiency gains alone cannot solve.

'Holistic infrastructure design supports long-term sustainability'

"True AI sustainability requires holistic infrastructure design - not just efficient algorithms. Without addressing hardware lifecycles and heat reuse, we're only shifting the environmental burden."

David Kohnstamm, Co-Founder & Chief Sustainability Officer, leafcloud





4. Measuring the State of the Digital Decade: 2024

The 2024 State of the Digital Decade report tracks the EU's progress towards a digital transformation that benefits people, businesses, and the environment.

The 2024 *State of the Digital Decade* report by the European Commission provides a comprehensive overview of the EU's progress toward a digitally transformed Europe that benefits people, businesses, and the environment. This vision, defined in the Digital Decade policy programme, targets digital infrastructure, skills, services, and business transformation to address a growing need for resilience, competitiveness, and sustainability across EU Member States. The progress made on these targets directly aligns with EU legislation, including the EU AI Act, designed to ensure the safe and ethical implementation of AI systems, and other regulatory frameworks that reinforce the EU's leadership in digital governance.

Digital Transformation Objectives for the EU by 2030

The EU's digital transformation agenda outlines specific objectives across critical areas: digital infrastructure, digital skills, digital business transformation, and public digital services. These areas serve as key pillars for a resilient digital economy and have associated performance indicators and targets monitored annually to assess progress:

1. **Digital Infrastructure:** The EU has prioritized connectivity and emerging technologies like high-performance computing (HPC) and quantum computing. Investments aim for ubiquitous 5G coverage, expansion of edge computing, and advancements in quantum technology to enhance EU digital sovereignty.
2. **Digital Skills:** Strengthening digital competencies across the population remains a core target, with the ambition to equip at least 80% of the population with basic digital skills and foster a workforce with over 20 million employed ICT specialists.
3. **Business Digital Transformation:** Increasing digital adoption among SMEs and larger enterprises aims to drive EU competitiveness. By 2030, the EU targets that 90% of SMEs have achieved significant digital intensity, with widespread adoption of cloud, big data, and AI solutions.
4. **Public Digital Services:** The EU strives for seamless, accessible digital public services, with ambitions for full eID coverage and improved access to digital health services across Member States.

Progress Overview for 2024

The *State of the Digital Decade* report highlights both achievements and challenges across these pillars, stressing the importance of accelerated progress to meet the 2030 targets. Major advancements include increased funding from the Recovery and Resilience Facility (RRF), strengthened cybersecurity frameworks, and development of cross-border digital infrastructure.

1. **Infrastructure and Connectivity:** The EU has achieved substantial progress in areas like fiber coverage, but quality and reliability of 5G remain inconsistent across the region. With only about 50% of the primary 5G band covered by high-quality service, substantial investments are still needed. Quantum computing and HPC initiatives continue to grow, with the first EU quantum computer expected to be operational by 2025.



2. **Digital Skills Development:** While nearly 55% of EU citizens have basic digital skills, the current pace is insufficient to reach the target of 80%. The shortage of ICT specialists poses a significant barrier, with a projected gap of 8 million professionals by 2030, underscoring the need for a focused digital workforce development strategy.
3. **Business Digital Transformation:** Progress among SMEs is slow, with digital uptake still low compared to target levels. Cloud and AI adoption remain well below target, especially among smaller firms. Supportive initiatives, including grants, tax incentives, and skill-building programs, are essential to bridge the gap and promote a dynamic digital business ecosystem.
4. **Digital Public Services:** Advances in eID, digital health, and other public services are visible, though disparities among Member States persist. The European Digital Identity Wallet (EDIW) and other digital service initiatives hold potential but require greater coherence in implementation and widespread public trust to reach their full potential.

Mapping Against the EU AI Act and Related Regulations

The EU AI Act, a landmark piece of legislation, regulates AI applications based on risk levels to mitigate ethical, societal, and safety concerns. It sets out requirements for high-risk applications, while promoting innovation-friendly policies to encourage AI uptake responsibly. In alignment with the Digital Decade targets, the AI Act intersects with the EU's goals in several domains:

1. **AI in Digital Services:** The AI Act establishes safety standards for AI deployed in public services, fostering trust and security in digital interactions. The Act aligns with the *Digital Services Act* (DSA), ensuring a safer online environment through stronger regulations on large platforms and data protections.
2. **AI in Business and Innovation:** Through streamlined standards, the Act supports safe AI development and use in businesses. The *Data Governance Act* complements this, facilitating secure and fair data sharing for AI development, while the *Data Act* standardizes data access rights essential for AI-driven business models. These combined regulations aim to bridge the innovation gap and encourage responsible AI adoption, especially among SMEs.
3. **AI for Environmental Sustainability:** The Digital Decade program underscores AI's role in supporting environmental sustainability through applications like energy-efficient data centers and climate monitoring. The *Green Digital Coalition* promotes resource-efficient digital solutions, with the AI Act ensuring that these advancements maintain safety and ethical considerations. In this sense, the possibilities of AI encourage (in particular young) people to pick up more technical roles, operating in the responsible AI ecosystem created by the Act.
4. **AI and Digital Skills Development:** The EU AI Act underscores the importance of fostering digital skills to prepare the workforce for AI-driven transformations. In alignment with the Digital Decade targets, the Act supports initiatives aimed at upskilling and reskilling individuals to ensure inclusivity in the digital economy. Complementary regulations, such as the Digital Education Action Plan, promote AI literacy, ethical awareness, and technical expertise among citizens, empowering them to engage with AI technologies responsibly and effectively.

Strategic Investments and Partnerships

EU investments in the digital transformation process have been significant, with an estimated €205 billion allocated to digital initiatives. This funding supports a variety of programs, including *Horizon Europe*, *Connecting Europe Facility* (CEF), *Digital Europe Programme*, and *InvestEU*, which collectively drive digital innovation, infrastructure, and skills development.

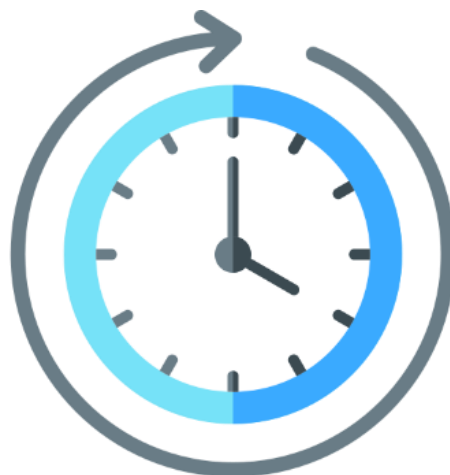


National Digital Decade roadmaps are a collaborative effort among Member States to implement cohesive strategies that align with EU targets, involving over 1,600 measures and €251.9 billion in investments. However, the progress to date indicates gaps, particularly in ICT specialists, digital public services, and edge computing infrastructure. These roadmaps need alignment with EU's goals to ensure the efficient use of resources and balanced progress across all regions.

Challenges and Recommendations for Accelerating Progress

1. **Closing the Skills Gap:** Addressing the skills shortage requires enhanced cooperation between educational institutions, private industry, and public sector organizations. Training programs, apprenticeships, and reskilling initiatives should be scaled up to equip the workforce with the necessary digital and technical expertise.
2. **Bridging Regional Disparities:** Digital transformation across the EU varies significantly. Regional disparities, particularly in rural and less-developed areas, require targeted investments and support to ensure that all regions benefit from connectivity and digital services.
3. **Strengthening AI Governance:** As the AI Act progresses toward final implementation, consistent enforcement across Member States will be crucial to harmonize AI standards. Collaboration with regulatory bodies and industry stakeholders will enable smoother implementation and adaptation.
4. **Sustainable Digital Infrastructure:** As digital demand grows, so does the energy footprint of the ICT sector. Green initiatives such as low-energy data centers, recycling programs, and renewable energy for digital infrastructure are critical to maintaining sustainable growth.
5. **Advancing Public Digital Services:** Although there is progress in e-government services, user adoption remains limited. Clear communication and user education about the benefits and security of these services, along with universal accessibility, will be key to their success.

The 2024 *State of the Digital Decade* report underscores the EU's progress towards its ambitious digital transformation goals, outlining critical milestones achieved and challenges to be addressed in the years leading to 2030. To fulfill the Digital Decade vision, accelerated action is essential, with sustained investments in digital infrastructure, targeted skill development, cohesive regulatory frameworks, and inclusive policies. The alignment of these efforts with the EU AI Act and other legislative measures further strengthens the EU's role as a global digital leader, capable of fostering a competitive, sustainable, and people-centric digital ecosystem that benefits all Europeans. The path forward requires intensified collaboration among Member States, industry, and communities to ensure that the Digital Decade is a success, delivering on its promise of a fair, green, and innovative Europe.





5. Case Study: France 2024

France's approach to the Digital Decade reflects its commitment to advancing digital infrastructure, improving digital skills, and fostering innovation while addressing challenges in digitalisation and inclusivity. Here's a detailed overview focusing on key takeaways for France, its Digital Decade KPIs for AI, key statistics for digital rights and principles, and how the EU AI Act helps empower and protect EU citizens and society.

Key Takeaways for France's Digital Progress

France has made commendable strides in digital transformation, prioritising infrastructure, research, and development through initiatives like the "France 2030" investment plan. This ambitious effort focuses on key technologies such as cloud, cybersecurity, artificial intelligence (AI), and quantum technologies, alongside the domestic production of semiconductors. However, digitalisation remains uneven, particularly among small and medium-sized enterprises (SMEs), with challenges in adopting advanced technologies like AI and cloud services.

In terms of connectivity, France is progressing well with 93.2% 5G coverage and robust fibre-to-the-premises (FTTP) infrastructure. This demonstrates a commitment to building comprehensive digital networks, though some weaknesses remain in enterprise-level digitalisation and skills development, suggesting room for improvement in meeting the demands of a rapidly evolving digital landscape.

France's ambition to enhance digital sovereignty and establish itself as a technological leader within the EU is evident in its proactive measures, such as fostering sovereign solutions in AI and cybersecurity and hosting European Digital Infrastructure Consortia (EDICs). However, efforts to boost digital skills and SME digitalisation are highlighted as areas requiring more strategic investment and support.

Digital Decade KPIs for AI

France's performance in digital transformation is guided by the EU Digital Decade 2030 targets. The key performance indicators (KPIs) for AI adoption and related digital technologies are as follows:

- **AI Uptake:** Currently, 6.7% of enterprises in France have adopted AI, reflecting a slight improvement but well below the EU target of 75% by 2030. This gap underscores the need for enhanced support for AI integration, particularly in the private sector.
- **Cloud Services:** Approximately 25.3% of French enterprises use cloud services, compared to an EU target of 75%. Encouraging greater cloud adoption remains a crucial step in France's digital transformation strategy.
- **Digital Skills:** Only 62% of the French population possesses basic digital skills, trailing behind the EU target of 80%. Improving digital literacy and encouraging ICT careers, particularly among youth and women, is vital for building a skilled workforce.
- **ICT Specialists:** The proportion of ICT specialists in the workforce stands at 4.7%, below the desired 10%. This figure highlights the need for increased visibility and attractiveness of ICT-related careers and educational pathways.



'France's Hesitant Steps Toward AI and Programming Education'

"In France, the integration of AI and programming languages into education remains limited. In middle school, no mandatory courses exist, although some schools offer optional programs. In high school, an introduction to programming languages in the first year continues only in scientific tracks, with no specific courses on AI. Overall, these skills remain marginal in curricula, relying on teachers' initiative to integrate these tools into the educational environment."

Dave Bohnert, Data Analyst, DataDave



Key Statistics on Digital Rights and Principles

The EU's emphasis on digital rights and principles is reflected in French citizens' perceptions and experiences with digital technologies. According to a Special Eurobarometer survey, only 39% of French respondents believe the EU effectively protects their digital rights, a figure that falls below the EU average of 47%. Concerns about online safety for children (52%) and control over personal data (45%) are prevalent.

Despite these worries, digital technology is widely appreciated for its role in maintaining social connections (valued by 85%) and providing access to public services (82%). France's commitment to advancing digital rights and principles is evident in its efforts to bridge digital divides, enhance online safety, and promote inclusivity.

EU AI Act: Protecting and Empowering Society

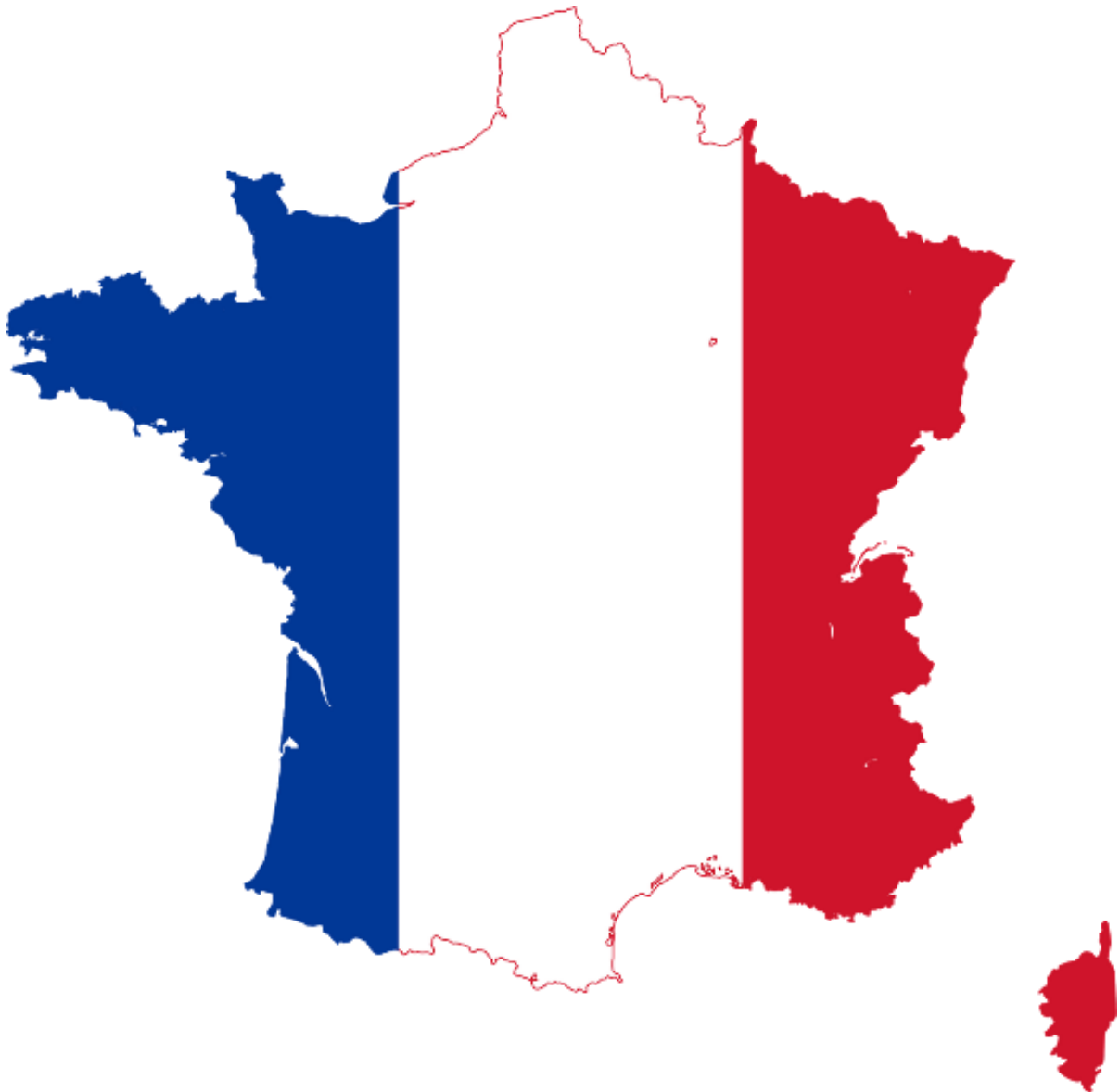
The EU AI Act plays a critical role in shaping AI governance, offering regulatory guidance that seeks to protect and empower EU citizens and society. This legislative framework establishes risk-based categorizations for AI applications, ensuring high-risk systems are subjected to rigorous oversight, transparency requirements, and accountability measures. France, as a key player within the EU, benefits from this structure through heightened consumer trust and safeguards against potentially harmful AI deployments.

The Act further emphasizes human-centric values, ensuring that AI technologies align with fundamental rights and democratic principles. For France, this means fostering ethical AI use, particularly in sensitive sectors such as healthcare, transport, and law enforcement. By embedding standards for fairness, transparency, and accountability, the EU AI Act protects citizens from discrimination and biases while promoting the responsible development and deployment of AI solutions.

Moreover, the Act aims to bolster public trust in AI by mandating clear labeling for AI-driven systems and ensuring individuals have recourse in cases of AI misuse. This regulatory clarity is instrumental in bridging the gap between technological innovation and societal values, ultimately empowering citizens and fostering digital resilience across the EU. France's adherence to these standards not only strengthens its digital landscape but also positions it as a leader in the responsible adoption of AI.



France's digital journey, while marked by achievements in infrastructure and ambition for technological leadership, faces challenges in digital skills development and enterprise digitalisation. The EU's Digital Decade targets and the protections offered by the AI Act offer a roadmap to achieving a more inclusive, secure, and innovative digital society. Through sustained efforts and strategic alignment with EU initiatives, France is poised to further its contributions to Europe's digital future.





6. Conclusion

The EU AI Act exemplifies Europe's commitment to a human-centric, trustworthy AI landscape, rooted in the principles of ethical governance, transparency, and respect for fundamental rights. This landmark regulation seeks to harmonize AI practices across member states, mitigating potential risks while promoting innovation. By adopting a risk-based approach, the Act ensures that AI systems with greater potential for harm, such as those impacting health, safety, and human rights, are subject to more rigorous oversight and standards.

The classification of AI systems into unacceptable, high, limited, and minimal risk categories establishes clear boundaries for developers and deployers, fostering accountability and minimizing harm. This structured approach addresses key societal concerns around bias, discrimination, privacy violations, and algorithmic as well as processual transparency. Also disclosure of information on development processes and model architecture is required. By banning AI systems that pose unacceptable risks, such as mass surveillance, the Act strengthens public trust and aligns with democratic values.

High-risk AI applications face strict requirements for quality assurance, transparency, and compliance. This includes obligations for human oversight, fairness assessments, and data governance. The Act mandates that deployers of high-risk systems conduct fundamental rights impact assessments, ensuring their AI solutions uphold ethical principles and avoid unintended consequences. Furthermore, measures such as AI regulatory sandboxes allow stakeholders to collaborate, test, and refine AI technologies within a controlled environment, facilitating innovation without compromising public safety. The EU AI Act goes beyond risk management to support SMEs, encourage ethical AI adoption, and foster public-private collaboration. Member states play a crucial role in tailoring implementation strategies that reflect national priorities, enhancing the Act's effectiveness. This cooperative spirit, coupled with guidance documents and resources, ensures a flexible and adaptive approach to regulation.

'Acknowledging threat of Artificial Superwisdom'

"Instead of fearing Artificial Superintelligence, we must focus on developing Artificial Superwisdom. The ultimate goal should be not to develop intelligent systems simply but wisdom-oriented systems—a "ChatGPT of wise action" that integrates rationality, intelligence, and moral insight to guide humanity toward better choices. This requires humility and a willingness to acknowledge our limitations while embracing systems capable of achieving greater wisdom than we can alone. Yes, we must fear the potential of Artificial Superintelligence, but embracing Artificial Superwisdom will help save us from ourselves!"

Patrick Orsos, Managing Partner, mgolT

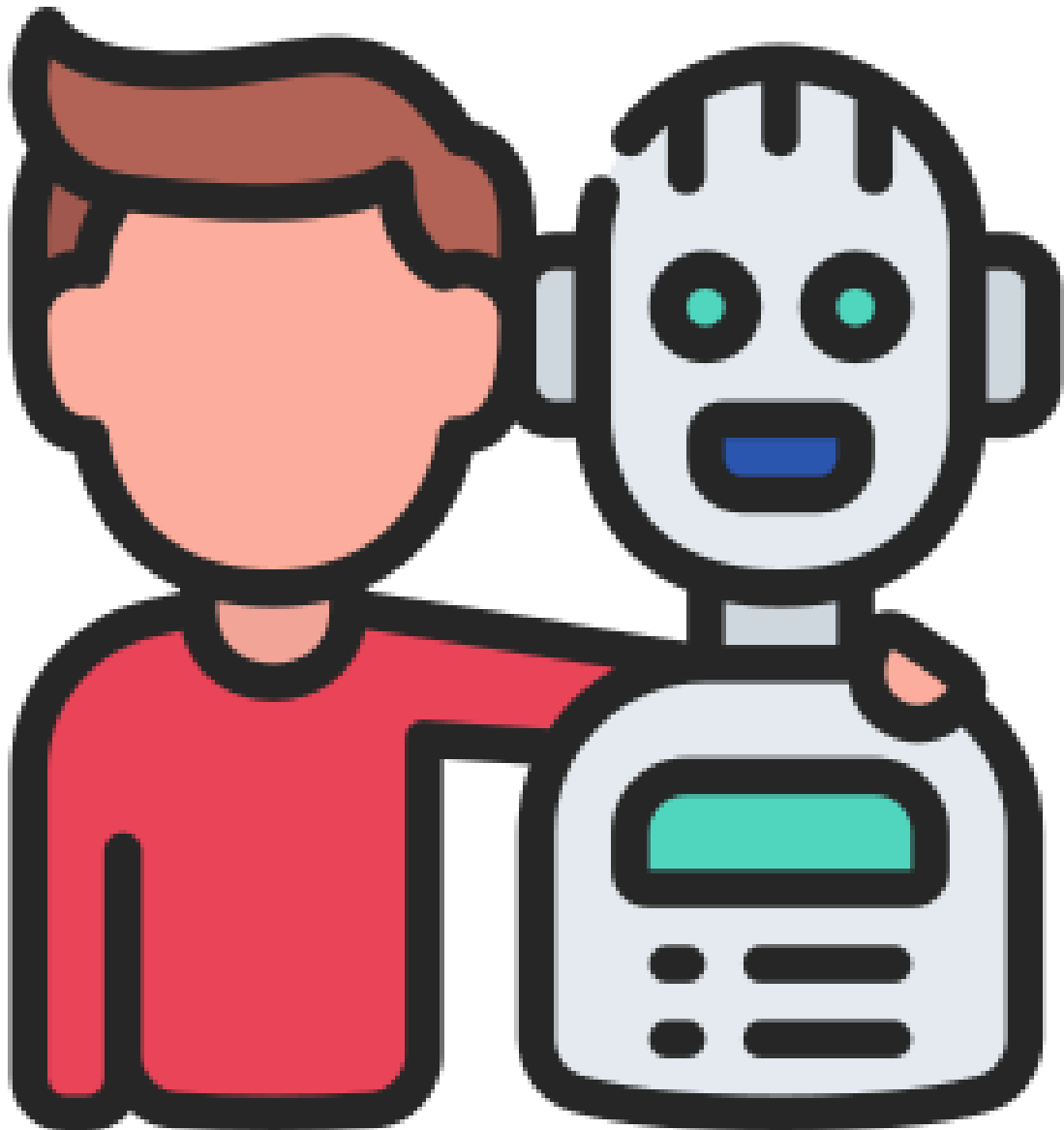




The Act's influence extends beyond Europe, with international governments and organizations considering it as a model for responsible AI governance. By setting high standards for transparency, accountability, and ethical AI development, the EU solidifies its leadership in AI regulation on a global scale. This could potentially harmonize international AI standards, promoting safety, fairness, and trust in AI-driven solutions worldwide.

A core strength of the Act lies in its alignment with other EU digital strategies, including the Digital Services Act and initiatives that promote digital skills, inclusivity, and environmental sustainability. Together, these regulations contribute to a cohesive, sustainable, and people-centric digital ecosystem. The Act not only regulates AI systems but also empowers citizens by enhancing transparency, safeguarding fundamental rights, and ensuring a high level of protection in digital interactions.

The journey to a fully regulated AI landscape is complex, requiring continuous collaboration among policymakers, businesses, and civil society. However, the EU AI Act's comprehensive approach establishes a strong foundation for navigating the challenges posed by AI's rapid advancement. It reinforces public trust, encourages responsible innovation, and aligns technological progress with societal values, creating a digital future that works for everyone. Through the implementation of this Act, Europe takes a decisive step toward a more ethical, inclusive, and human-centric AI-driven society.





Annex B – Third-Party Opinions (Karushkov)

Opinion 1

Terms as “digital transformation” or “reliable technology”, or “trustworthy AI” fall beyond the generic marketing phrases. These, in fact mark a form of an upgrade at some industries or companies, including those that are not purely technological. About a century ago our predecessors hoped for a trustworthy light bulb, where some of them feared or opposed its implementation. It was, in fact, an upgrade, which nowadays relates to something taken for granted. Some 30 years ago, part of us enjoyed a “communication transformation” – when the Internet appeared, and passed through dial-up, LAN and other wire technologies, to reach the today’s wireless, touch-, voice- or face- operated environment, which is frequently found in our pockets. Well, same goes for the current generation of technology transformation – the one that brings, for example, machine-generated knowledge in a matter of seconds. The trustworthiness of this needs to be regulated (taking Europe as an example) or de-regulated – taking the most recent developments in the USA. It is a process, at which the companies need a reliable knowledge (preferably human generated), so to be able to comply and succeed. For more reliable information on the market and compliance environment, please visit www.karushkov.com

Opinion 2

Amongst the leading principles of the EU regulated AI one can recognize the human oversight. This does not oppose the digitalization yet assumes that the transformation shall not only be directed to people but also needs to be supervised by people. New (labor, operational) functions appear along with technology transformation, including the AI driven transformation – both at the end of the consumers and on the business side. A client of mine (notable TV host) recently shared their preoccupation that “the AI will erase professions like this”.

The trustworthy AI needs to touch such aspects on the market – the fear - and also needs to address the issue in a manner that shall allow the fear to be replaced by the real world matters, namely: “if the market likes you, you wouldn’t be erased by a software”, and let the software do its thing in a trustworthy manner. At Karushkov Legal Solutions we assist and inform our clients on the real effects of digital transformation, including AI. For more information you can see this video that we recently uploaded - https://www.linkedin.com/posts/mitko-karushkov-3533882_productliability-artificialintelligence-ai-activity-7283469474081464321-pqte?utm_source=share&utm_medium=member_ios.





About AI & Partners



AI & Partners

Amsterdam – London - Singapore

AI & Partners – ‘AI That You Can Trust’

At AI & Partners, we’re here to help you navigate the complexities of the EU AI Act, so you can focus on what matters—using AI to grow your business. We specialize in guiding companies through compliance with tailored solutions that fit your needs. Why us? Because we combine deep AI expertise with practical, actionable strategies to ensure you stay compliant and responsible, without losing sight of your goals. With our support, you get AI you can trust—safe, accountable, and aligned with the law.

To find out how we can help you, email contact@ai-and-partners.com or visit <https://www.ai-and-partners.com>.



Contacts

Sean Donald John Musch, CEO/Founder, s.musch@ai-and-partners.com

Michael Charles Borrelli, Director, m.borrelli@ai-and-partners.com

Authors

Sean Donald John Musch, CEO/Founder

Michael Charles Borrelli, Director



References

European Commission, (2023), '2023 Report on the state of the Digital Decade', accessible at <https://digital-strategy.ec.europa.eu/en/library/2023-report-state-digital-decade> (last accessed 9th November 2024)

European Commission, (2024), '2024 State of the Digital Decade package', accessible at <https://digital-strategy.ec.europa.eu/en/policies/2024-state-digital-decade-package> (last accessed 9th November 2024)

European Commission, (2022), 'European Declaration on Digital Rights and Principles', accessible at <https://digital-strategy.ec.europa.eu/en/library/european-declaration-digital-rights-and-principles> (last accessed 9th November 2024)

European Commission, (2024), 'Europe's Digital Decade', accessible at https://digital-strategy.ec.europa.eu/en/policies/europes-digital-decade#tab_3 (last accessed 9th November 2024)

European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: <https://economie.fgov.be/fr/file/7467299/download?token=5laXYJx1> (last accessed 12th January 2025)

European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: https://bmdv.bund.de/SharedDocs/DE/Anlage/DG/Digitales/nationaler-fahrplan-zur-digitalen-dekade.pdf?__blob=publicationFile (last accessed 12th January 2025)

European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: https://digitalstrategy.gov.gr/website/static/website/assets/uploads/digital_decade_national_roadmap.pdf (last accessed 12th January 2025)

European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: <https://digital-strategy.ec.europa.eu/en/factpages/netherlands-2024-digital-decade-country-report#:~:text=The%20Netherlands%20Digital%20Decade%20strategic,with%20the%20EU%202030%20ambitions.> (last accessed 12th January 2025)

European Commission, (2024), 'National Digital Decade strategic roadmaps', accessible at: <https://www.regeringen.se/contentassets/aee609035b9147238a29c94a0094248f/svensk-nationell-fardplan-for-eus-digitala-decennium.pdf.pdf> (last accessed 12th January 2025)

European Parliament and The Council of the European Union, (2024), 2024/1689 Regulation (EU) 2024/1689 of the European Parliament and of The Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act), accessible at https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401689 (last accessed 8th November 2024)



Acknowledgements

Corporate Partners

We are grateful to our network of corporate partners for their invaluable contributions:





Individual Partners

We are also grateful to our network of individual supporters for their invaluable contributions:

Arno Debelle, Arno Debelle has nearly a decade of experience as a lawyer. Arno combines his legal expertise with a passion for technology and AI. After learning to code, Arno gained hands-on experience in data science, machine learning, and AI project development. This unique blend of skills allows Arno to navigate the intersection of emerging technologies and legal compliance, creating innovative, responsible, and scalable AI solutions. Currently, Arno is focused on entrepreneurial ventures and strategic legal consulting, driving impact where law meets AI.

Anandaday Misshra, As a legal professional with over 27 years of experience, Anandaday Misshra specializes in data privacy, artificial intelligence, Goods and Services Tax (GST), international arbitration, international laws, and strategic dispute resolution across diverse jurisdictions. My career is dedicated to assisting organizations in navigating the complexities of legal compliance within an ever-evolving regulatory landscape.

Charles Kerrigan, Charles is part of teams working on transactions and consulting/advisory for emtech in the UK, EMEA, and the US. He was invited to be a founding member of the UK Parliament's Advisory Group on AI in 2016, acting as legal advisor to the group, and has remained a member to the present. He has worked in AI in academic and legal contexts since 2010. At CMS he is part of the firm's specialist emerging technologies team. He works on business model and go-to-market strategies in AI; on investment and M&A in the deep tech sectors; on implementation projects to establish compliance with AI regulations and standards; on technical writing and policies; and on AI literacy projects and other institutional training. His clients include global technology firms and financial institutions; VC and other deep tech investment firms; and governments and regulators. He has recently written the worldwide AI training modules for a global bank. He is a Board Advisor of Holistic AI <https://www.holisticai.com/> and Home | AI & Partners (ai-and-partners.com) He sits on the advisory boards of the Investment Association Engine The IA Engine - FinTech accelerator from The Investment Association and the All Party Parliamentary Group on Artificial Intelligence (APPG AI) APPG AI 2024.2025 Brochure (May 2024) (biginnovationcentre.com). He is the Chair of the Technology Working Group of the Association of Real Estate Funds Tech Working Group - January 2020 (aref.org.uk). He teaches on AI and entrepreneurship at UCL.

Dave Bohnert, Dave Bohnert is an expert at the intersection of clinical data management, data science, and regulatory compliance. As a Clinical Data Programmer at a leading Contract Research Organization (CRO), he ensures the quality and integrity of clinical data for global pharmaceutical and biotech research studies. His work includes programming data manipulations, integrating external data sources such as ECG and lab results, and preparing SAS datasets for regulatory submissions, including to the FDA.

David Kohnstamm, David Kohnstamm is the co-founder, resident thermodynamics expert, and Chief Sustainability Officer at Leafcloud, where his expertise in servers and thermal dynamics plays a pivotal role in shaping the company's vision and the design of Leaf sites. His work focuses on transforming server heat into a reusable resource, leveraging his background as an engineer with a passion for building and innovation. David's journey into the tech world began in engineering, building solar boats and electric bikes. He then transitioned to energy management, arriving at the intersection of IT hardware and thermal management through trialing various immersion cooling solutions. Captivated by the potential of reusing server heat on a large scale, he co-founded Leafcloud in 2019 to bring this vision to life. David's innovative approach and dedication to sustainability have not only propelled Leafcloud forward but also made him a sought-after speaker at industry events worldwide. His insights



and the company's groundbreaking work have been featured in the documentary "Clouded II: Does Cloud Cost the Earth?", highlighting the environmental impacts of cloud computing. Outside of his professional endeavors, David is an avid cycle-smith, a proud father of two, and enjoys board games.

Dr. Benedikt Kohn, Dr. Benedikt Kohn is a specialist lawyer in information technology law in the technology, media and telecommunications practice group of Taylor Wessing. He has particular expertise in legal issues related to digitization and artificial intelligence. His areas of expertise include IT contract drafting, advising on complex data protection projects, and advising on the implementation of new regulatory requirements for the use of AI. Dr. Benedikt Kohn regularly publishes and speaks on the topics of digitization and AI regulation.

Dr. Theodoros Karathanasis, Dr. Theodoros Karathanasis is an independent Researcher and Consultant on legal and regulatory implications of AI and member of the cyber experts networks the European Centre of Excellence for Combating Hybrid Threats (HybridCoE), as well as the EU CyberNet.

Ina SX'chöne, Ina Schöne is Founder of Data Privacy and AI and follows the a practice oriented approach to understand the requirements of AI-Act and the measures to implement this requirements based of the ISO/IEC42001 and additional and guides the companies on the path to get the corresponding certifications. Currently she is in qualification of ISO/IEC42001 Lead Auditor Program for Artificial Management systems.

Martin Heitmann, Martin Heitmann is a trained business mathematician, holding BSc and MSc from the University of Mannheim. Serving in a consultant role for close to a decade, he supported organizations in the finance and Life Sciences sector to develop robust and effective AI systems. Now with a healthcare and Life Sciences focus, he serves in various community leadership roles in collaboration with organizations globally to enable safe innovation.

Michael Boevink, Michael Boevink has more than 20 years management experience in the fintech and banking industry and is founder of his own investment company Boevink Group. Mr. Boevink specialises in capital raising, scaling and executing go-to-market strategies and business development growth in global markets and is engaged in companies as Raimac Financial Technology - Raimac.io - a programmable payment solution. He holds an MBA from the University of Bradford.

Mihaela Ulieru, Mihaela Ulieru is the Founder and President of IMPACT Institute for the Digital Economy. Working with governments, international institutions, civil society and private sector partners to mitigate global challenges by using digital technologies as an integrated component of policy making. Builds major programs leading the scaling-up of operations through strategic partnerships and networks: Industrial Informatics, Future of Medicine, Self-Organizing Security, EnergyWeb, Global Manufacturing Systems, Sustainable Personal Living Technologies, Organic Governance. Creates new solutions, markets and revenue securing large-scale funding from a variety of public and private sources to improve quality of life and global sustainability through technology development and accessibility.



Mitko Karushkov, Mitko Karuskov has been providing legal, regulatory, compliance, transactional and business solutions to international companies for more than 20 years now. Focused on enterprise companies and their strategic (or daily) operations, Mitko has solved matters related to the digital, tech or electronic assets of such businesses. Active and involved also in bridging between traditional and technology markets, including to the application of the EU DSA, DMA, AI and other regulations. Media, Telecoms, IPRs, Corporate, M&As are also part of the service portfolio of Mitko. For further information: www.karushkov.com.

Patrick Orsos (mgolT), Patrick Orsos has years of experience in technology, startups, and software development, Patrick has a proven track record of translating business needs into technical solutions that drive success. Patrick's problem-solving skills have enabled him to create innovative solutions that solve complex challenges and create value for clients. One of Patrick's most notable achievements was leading the development of Gopack, a revolutionary start-up that transformed the transport industry through digitalization. During his tenure, Patrick oversaw the development of the first digital ecosystem for small transportation businesses in Central & East Europe, which was awarded by Samsung and trusted by CEC Bank. Under Patrick's leadership, Gopack achieved an impressive 30% increase in efficiency and a 20% reduction in costs for clients.

Prof. Ingrid Vasiliu-Feltes, MD EMBA, Prof. Dr. Ingrid Vasiliu-Feltes is a visionary leader operating at the intersection of academia, business, government and not-for-profit sectors, recognized globally for her deep tech diplomacy and digital ethics efforts. With over two decades of executive experience, she has held numerous high-impact leadership roles and has extensive complex system integration expertise, driving the development of responsible, inclusive, diverse, sustainable AI, blockchain and other deep tech innovation ecosystems at a regional, national or international level. Her unique background positions her as a thought leader on how emerging or frontier technologies are posing unique ethical challenges and are reshaping law, regulatory frameworks, corporate governance, risk management, compliance and enterprise digital strategy. She is an alumna of MIT, Harvard, Stanford, Columbia University, and University of Miami's Herbert Business School. She is a Lean Six Sigma Master Black Belt, holding executive certifications in AI, Blockchain, Finance, Mediation, Tech Diplomacy, Human Rights, and Ethics. She has served as an expert advisor to numerous Fortune 100 and 500 companies, US DOD, IEEE, NIST, and EU, UN or G20-affiliated organizations, guiding them on strategic decisions around digital transformation, digital risk governance, digital trust, and digital cyber-ethics orchestration."



Patrick Orsos,
Founder, mgIT



Dr. Mihaela Ulieru,
IMPACT Institute for the Digital Economy, LLC



Patrick Heitmann,
*Guiding Teams to Success | Fostering
Industry Best Practices | Enabling
Innovation in Pharma & Healthcare*



Prof. Ingrid Vasiliu-Feltes, MD EMBA,
*Founder and CEO, Institute for Science, Entrepreneurship
and Investments*



Michael Boevink,
Founder, Boevink Group



Dr. Theodoros Karathanasis,
Research Fellow on AI Regulation



Charles Kerrigan,
*Partner,
CMS Law*



Dr. Benedikt Kohn,
*Tech Attorney | AI Regulation
| IT & Data, Taylor Wessing*



Dave Bohnert,
Data Analyst, DataDave



Anandaday Misshra,
Founder and Managing Partner, AMLEGALS



David Kohnstamm,
*Co-Founder and Chief Sustainability
Officer, leafcloud*



Ina Schöne,
*Founder,
Data Privacy and AI*



S

Mitko Karushkov,
Founder, Karushkov Legal Solutions



Arno Debelle,
Attorney-at-Law

Important notice

This document has been prepared by AI & Partners B.V. for the sole purpose of enabling the parties to whom it is addressed to evaluate the capabilities of AI & Partners B.V. to supply the proposed services.

Other than as stated below, this document and its contents are confidential and prepared solely for your information, and may not be reproduced, redistributed or passed on to any other person in whole or in part. If this document contains details of an arrangement that could result in a tax or National Insurance saving, no such conditions of confidentiality apply to the details of that arrangement (for example, for the purpose of discussion with tax authorities). No other party is entitled to rely on this document for any purpose whatsoever and we accept no liability to any other party who is shown or obtains access to this document.

This document is not an offer and is not intended to be contractually binding. Should this proposal be acceptable to you, and following the conclusion of our internal acceptance procedures, we would be pleased to discuss terms and conditions with you prior to our appointment. Images used throughout the document have either been produced in-house or sourced from publicly available sources (see **References** for details).

AI & Partners B.V. is the Dutch headquarters of AI & Partners, a global professional services firm. Please see <https://www.ai-and-partners.com/> to learn more about us.

© 2025 AI & Partners B.V. All rights reserved.

Designed and produced by AI & Partners B.V.