AT-A-GLANCE

# EU AI Act Compliance Matrix

By IAPP Principal Researcher, Privacy Law and Policy, Müge Fazlioglu CIPP/E, CIPP/US

This resource is intended to aid in compliance with the EU AI Act by providing a high-level overview of its key requirements for organizations. The table below illustrates the articles of the EU AI Act that apply to each operator across three broad classes: high-risk AI systems, AI systems and general-purpose AI models. The checkmarks indicate the operators to which each article is of primary relevance, recognizing it may still be applicable or relevant to others not explicitly referenced. The analysis herein is based on the EU AI Act published 13 June 2024 in the Official Journal of the European Union. View a more in-depth version of this resource at iapp.org.

| | THE OPERATORS | | | | | |
|---|---|---|---|---|---|---|
| | Providers | Deployers | Product manufacturers | Authorized representatives | Importers | Distributors |
| **HIGH-RISK AI SYSTEMS** | | | | | | |
| **Article 6:** Classification rules for high-risk AI systems | ✓ | | | | | |
| **Article 8:** Compliance with the requirements | ✓ | | | | | |
| **Article 9:** Risk management systems | ✓ | | | | | |
| **Article 10:** Data and data governance | ✓ | | | | | |
| **Article 11:** Technical documentation | ✓ | | | | | |
| **Article 12:** Record-keeping | ✓ | | | | | |
| **Article 13:** Transparency and provision of information to deployers | ✓ | ✓ | | ✓ | | |
| **Article 14:** Human oversight | ✓ | ✓ | | | | |
| **Article 15:** Accuracy, robustness and cybersecurity | ✓ | | | | | |
| **Article 16:** Obligations of providers of high-risk AI systems | ✓ | | | | | |
| **Article 17:** Quality management system | ✓ | | | | | |
| **Article 18:** Documentation keeping | ✓ | | | ✓ | | |
| **Article 19:** Automatically generated logs | ✓ | | | | | |
| **Article 20:** Corrective actions and duty of information | ✓ | ✓ | | ✓ | ✓ | ✓ |
| **Article 21:** Cooperation with competent authorities | ✓ | | | | | |
| **Article 22:** Authorized representatives of providers of high-risk AI systems | ✓ | | | ✓ | | |
| **Article 23:** Obligations of importers | ✓ | | | ✓ | ✓ | |
| **Article 24:** Obligations of distributors | ✓ | | | | ✓ | ✓ |
| **Article 25:** Responsibilities along the AI value chain | ✓ | ✓ | ✓ | | ✓ | ✓ |
| **Article 26:** Obligations of deployers of high-risk AI systems | ✓ | ✓ | | | ✓ | ✓ |
| **Article 27:** Fundamental rights impact assessments for high-risk AI systems | | ✓ | | | | |
| **Article 41:** Common specifications | ✓ | | | | | |
| **Article 43:** Conformity assessments | ✓ | | | | | |
| **Article 44:** Certificates | ✓ | | | | | |
| **Article 47:** EU declaration of conformity | ✓ | | | | | |
| **Article 48:** CE marking | ✓ | | | | | |
| **Article 49:** Registration | ✓ | ✓ | | ✓ | | |
| **Article 71:** EU database for high-risk AI systems listed in Annex III | ✓ | ✓ | | ✓ | | |
| **Article 72:** Post-market monitoring by providers and post-market monitoring plan for high-risk AI systems | ✓ | ✓ | | | | |
| **Article 73:** Reporting of serious incidents | ✓ | ✓ | | | | |
| **Article 86:** Right to explanation of individual decision-making | | ✓ | | | | |
| **AI SYSTEMS** | | | | | | |
| **Article 4:** AI Literacy | ✓ | ✓ | | | | |
| **Article 49:** Registration | ✓ | | | ✓ | | |
| **Article 50:** Transparency obligations for providers and users of certain AI systems | ✓ | ✓ | | | | |
| **Article 71:** EU database for high-risk AI systems listed in Annex III | ✓ | ✓ | | ✓ | | |
| **GENERAL-PURPOSE AI MODELS** | | | | | | |
| **Article 41:** Common specifications | ✓ | | | | | |
| **Article 51:** Classification of general-purpose AI models as general-purpose AI models with systemic risk | ✓ | | | | | |
| **Article 52:** Procedure | ✓ | | | | | |
| **Article 53:** Obligations for providers of general-purpose AI models | ✓ | | | | | |
| **Article 54:** Authorized representatives of providers of general-purpose AI models | ✓ | | | ✓ | | |
| **Article 55:** Obligations for providers of general-purpose AI models with systemic risk | ✓ | | | | | |
| **Article 56:** Codes of practice | ✓ | | | | | |
| **Article 89:** Monitoring actions | ✓ | | | | | |

With a focus on the EU AI Act's requirements for various operators, this table excludes articles that enumerate the powers of the member states, European Commission, AI Office, market surveillance authorities and all other EU institutions, bodies, offices and agencies.



Updated October 2024.

**iapp.org**