



# ACUITY DATA

## EU AI Act

# Implementation Guide

### DOES THIS APPLY TO YOU?

- You place AI on the EU market
- Your AI affects EU citizens or processes their data
- You use AI tools with EU-facing outputs
- You have EU clients, partners or portfolio companies

### COMPLIANCE TIMELINE

<b>FEB '25</b>	<b>ACTIVE</b>	Prohibited practices banned. AI literacy mandatory.
<b>AUG '25</b>	<b>ACTIVE</b>	GPAI model obligations.
<b>AUG '26</b>	<b>CRITICAL</b>	High risk AI rules. Full enforcement begins.
<b>AUG '27</b>	<b>UPCOMING</b>	AI in regulated products.

### Step 0 – classify your AI system

#### Unacceptable Risk

*Prohibited since Feb 2025*

Social scoring, subliminal manipulation, real-time biometric ID in public, emotional inference at work.

#### High Risk

*Deadline Aug 2026*

Recruitment AI, credit scoring, education assessment, law enforcement, critical infrastructure

#### Limited Risk

*Transparency - Aug 2026*

Chatbots, AI-generated content must disclose AI interaction & label synthetic media.

#### Minimal Risk

*No mandatory obligation*

Spam filters, basic recommendations (good practice advised)

### Phase 1 – Governance (All organisations - start now)

- Map all AI systems (sanctioned & unsanctioned)
- Classify each by risk level, document provider / deployer role
- AI literacy training is mandatory since Feb 2025. Make sure to document it.
- Appoint AI governance lead (**board accountability, not IT**)
- Acceptable Use Policy, vendor DPAs, data portability clauses

### Phase 2 – High Risk (High risk systems - Aug 2026)

- Risk management system: design, testing, monitoring
- Technical documentation: purpose, architecture, training data
- Human oversight mechanisms (how humans override the system)
- Conformity assessment (self or third party)
- Register in EU AI database before placing on market

### Phase 3 – Monitoring (All in scope - from Aug 2026)

- Disclose AI interactions to users (chatbots, automated decisions)
- Label AI generated content that could be mistaken for real media
- Report serious incidents to national surveillance authority
- Post - market monitoring (bias metrics, model drift, performance)
- Annual bias review (update docs on system modification)

### COMMON MISTAKES TO AVOID

#### THIS DOESN'T APPLY IN THE UK

Extraterritorial scope applies if you affect EU citizens or markets.

#### WE'RE JUST A DEPLOYER

High-risk deployers have major obligations: risk assessment, oversight, training.

#### WE'LL WAIT FOR THE DIGITAL OMNIBUS

Not adopted. Plan for Aug '26. Do not rely on potential delays.

#### ONE LITERACY SESSION IS ENOUGH

Must be ongoing, role-appropriate and individually documented.

#### WE HAVE A POLICY DOCUMENT

Requires audit trails, oversight mechanisms and demonstrable evidence.

### NEED HELP WITH YOUR EU AI ACT READINESS?

Acuity Data conducts readiness assessments, risk classification through to audit-ready documentation.

**GET IN TOUCH TODAY: [HELLO@ACUITYDATA.IO](mailto:HELLO@ACUITYDATA.IO)**

Get your systems assessed before a regulatory inquiry does it for you.  
<https://www.acuitydata.io/regulatory-compliance>

As at April 2026

