

EU AI Act Face Recognition Compliance Checklist

AI for Video Engineering · Lesson 2.6 — Twelve questions to answer before deploying any face feature in the EU.

1. Classification

- ☐ Does the system **identify** or **verify** a person by face?
- ☐ If only detection: no AI Act / Annex III obligations.
- ☐ If recognition: classified as high-risk under Annex III.

2. Article 5 prohibition check

- ☐ Not built from untargeted scraping of web/CCTV.
- ☐ Not deployed for workplace or school emotion recognition.
- ☐ Not used to categorize by race, religion, orientation.
- ☐ Not real-time public identification by law enforcement.

3. GDPR Article 9 lawful basis

- ☐ Explicit consent collected (written / signed / recorded).
- ☐ Consent revocable at any time without detriment.
- ☐ Consent log persisted with per-purpose granularity.

4. Data minimization

- ☐ Raw pixels discarded after the embedding is produced.
- ☐ Smallest embedding dim that solves the task chosen.
- ☐ Storage segregated by purpose (hot / cold / forensics).

5. Retention policy

- ☐ Per-purpose retention period documented in writing.
- ☐ Automatic deletion job runs and is monitored.
- ☐ Right-to-erasure handler tested end-to-end.

6. Liveness / anti-spoofing

- ☐ Passive liveness model trained or licensed.
- ☐ iBeta PAD certification path planned (high-stakes).

7. Article 9 — Risk management (AI Act)

- ☐ Risk register with owner per risk, mitigation evidence.
- ☐ Quarterly re-review scheduled.

8. Article 10 — Data governance

- ☐ Training/validation sets relevant and representative.
- ☐ Demographic accuracy parity tested (NIST FRVT or equiv).
- ☐ Bias metrics published in technical documentation.

9. Article 11 — Technical documentation

- ☐ Annex IV dossier: purpose, architecture, datasets, metrics.
- ☐ Instructions-for-use document for deployers prepared.

10. Article 12 — Record-keeping

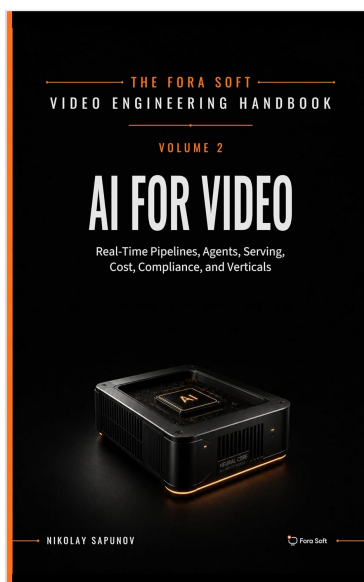
- ☐ Tamper-evident log of every identification decision.
- ☐ Model version and threshold changes logged.

11. Article 14 — Human oversight

- ☐ Human review on every consequential match before action.
- ☐ Reviewer UI surfaces source frame, template, confidence.
- ☐ No fully automated denial / arrest / contract decision.

12. Articles 27 + 49 — FRIA + EU registration

- ☐ Fundamental Rights Impact Assessment completed.
- ☐ System registered in EU database before deployment.
- ☐ Article 50 transparency notice shown to end users.



GO DEEPER · VOLUME 7 OF 7

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This checklist walks through the twelve questions to answer before a face feature goes live in the EU. Volume 7 covers this regulation in depth: the EU AI Act risk classes, biometric rules and C2PA provenance, plus the serving, logging and human-oversight setup a high-risk system needs in production.

WHAT YOU WILL FIND INSIDE

- EU AI Act risk classes and obligations
- C2PA content provenance
- Biometric data rules for video AI
- Production logging and human oversight

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