

In the fast-evolving world of artificial intelligence regulation, clarity is essential not only for developers and providers but also for the millions of European Union (EU) citizens interacting with AI systems every day. A phrase stirring much discussion lately is the compliance timeline indicated by the phrase "*at the latest at the time of first interaction or exposure.*" This phrase relates directly to the EU AI Act's transparency requirements, specifically under **Article 50**, which mandates timely disclosures when users first encounter AI systems.

Understanding what this phrase entails is critical not only for EU-based companies but also for global tech firms deploying AI-powered products in Europe. In this post, we'll unpack the meaning of this phrase, explore the responsibilities of AI providers versus deployers, highlight the extraterritorial scope of the regulation, and discuss best practices related to the first-interaction disclosure timing. We'll also reference perspectives from industry experts including Coruzant Technologies, and regulatory authorities such as the European Commission and the European Data Protection Supervisor (EDPS). We'll finally highlight the role of accessibility tools like screen readers and voice product interfaces in facilitating compliance.

Understanding the First Exposure Timing in the EU AI Act

The EU AI Act introduces a range of rules aimed at fostering trustworthy, transparent AI systems. Article 50, the *Transparency obligation*, requires that users be informed whenever they are interacting with an AI system, unless this is obvious from the context. The critical factor here—the timing—is encapsulated in the clause "at the latest at the time of first interaction or exposure."

Defining the Phrase

Put simply, this phrase means that the disclosure to the user about AI involvement must be made **prior to or at the very moment the user first experiences or interacts with the AI system**. It cannot come after the fact, nor can it be delayed until the user has already formed an impression or taken action that assumes human intervention. The rationale is to create transparency that enables informed decisions from the outset.



Why Timing Matters

- **Informed Consent:** Users should know whether they are interacting with an AI before making decisions.

- **Avoiding Deception:** Delayed disclosures can mislead users about the nature of their interactions.
- **Regulatory Compliance:** Authorities such as the European Commission and EDPS closely scrutinize adherence to this timing to uphold citizen rights.

As Coruzant Technologies, a leader in UX for AI-driven customer support chat solutions, articulates, “The moment a user touches the product interface, the AI’s presence must be clearly signposted to build trust and avoid ambiguity.”

Provider Responsibility vs Deployer Responsibility

The EU AI Act distinguishes roles and responsibilities among *providers* and *deployers* of AI systems, which impacts how and when disclosures should be made.

Role Definition	Responsibility for Transparency Disclosure
Provider	Individual or entity developing or manufacturing the AI system. Must ensure the system is designed to enable the first interaction disclosure.
Deployer	Entity that decides to use the AI system and makes it available to end users. Must implement the necessary measures to ensure users receive the disclosure in time.

While providers are required to create AI systems with the transparency features in mind, deployers typically carry the onus to integrate appropriate disclosures within the user experience at the point of first interaction. This division sometimes leads to ambiguity, especially for companies that both develop and deploy AI. The EDPS stresses the importance of clear contracts and roles to avoid gaps in compliance.

The Extraterritorial Reach of the EU AI Act

One noteworthy aspect of the EU AI Act is its extraterritorial scope: **non-EU companies deploying AI systems in the European market must comply with these disclosure and timing requirements.** This means AI providers based in Silicon Valley, for example, must ensure that their AI-powered chatbots and voice assistants disclose their AI nature at the first user interaction when serving European users.

Coruzant Technologies has observed an industry-wide push toward global compliance frameworks inspired by the EU AI Act, with companies aiming to standardize first interaction timing disclosures no matter where the user resides. This avoids fragmented compliance efforts and supports seamless user trust globally.

First-Interaction Disclosure Timing in Practice

How can organizations effectively implement the “at the latest at the time of first interaction or exposure” requirement? Let’s explore practical examples and guidelines, keeping in mind the needs of accessibility and user experience.

1. Digital Interfaces (Chatbots and Web Portals)

- **Clear Labeling:** The interface should explicitly state, before any user input is solicited, that the user is interacting with an AI system.
- **Accessible Disclosure:** Use simple language and formatting that can be read out loud by screen readers to ensure compliance with accessibility standards.
- **Voiceovers & Tooltips:** For voice product interfaces, ensure that verbal cues clearly announce AI involvement right at the system’s greeting or invocation.

For example, a customer support chat might open with: *"Hello! I am your AI assistant here to help you today."* Reading this out loud mimics what voice interfaces require and highlights clarity.

2. Voice Product Interfaces

Voice assistants and AI-powered phone support systems must announce their AI-driven nature as their introductory message. This is especially critical because users cannot see an interface label and rely entirely on auditory information. Effective phrasing might be:

"Hi, I'm an AI-powered assistant. How can I help you today?"

Such upfront disclosures ensure users understand immediately with whom—or what—they are communicating, enabling them to adjust their expectations accordingly.

3. Physical or Public Environments

AI systems deployed in kiosks, digital signage, or public-facing robots must also indicate in visible or audible ways that the interaction is AI-driven before users engage. Failure to provide timely disclosure risks violating Article 50.

Accessibility Is a Non-Negotiable Component

Transparency must be accessible to all users. The European Commission and EDPS emphasize that disclosures required by Article 50 should work seamlessly with assistive technologies such as screen readers. This means the text or message announcing AI must be programmatically accessible, correctly tagged in the markup, and properly formatted so that individuals relying on such technologies receive the information at the correct time.

Testing copy by reading it aloud—as if through a voice assistant—ensures that the disclosure is clear in auditory as well as visual contexts. UI ambiguity is a known cause of support tickets, as users often reach out when unsure whether they are conversing with a human or AI. By addressing this upfront, companies reduce confusion and improve user satisfaction.



Conclusion: Meeting the AI Act Disclosure Deadline with Clarity and Integrity

The phrase "*at the latest at the time of first interaction or exposure*" anchors a critical transparency standard in the EU AI Act. Its implications ripple across product design, legal compliance, and user experience, especially for companies targeting the European market. Providers and deployers must act collaboratively to ensure disclosures are timely, accessible, and easy to understand.

Drawing from insights by Coruzant Technologies and guidance from the European Commission and European Data Protection Supervisor, it is clear: the future of AI transparency hinges on upfront honesty. Properly executed first interaction disclosure not only meets regulatory deadlines but fosters trust in AI-powered systems—an essential ingredient for long-term adoption and user satisfaction.

Key Takeaways

1. **First interaction disclosure** means informing users of AI involvement before or immediately when they first encounter the system.
2. **Providers design AI with necessary transparency features; deployers ensure disclosures are delivered at the right time.**
3. **The EU AI Act applies extraterritorially to non-EU companies serving EU users.**
4. **Accessibility considerations are critical to ensure that disclosures are perceivable through screen readers and voice interfaces.**
5. **Clear, upfront communication reduces confusion, support tickets, and builds trustworthy AI experiences.**

As AI adoption continues to grow worldwide, the principles embodied by this phrase will become pillars of ethical AI deployments globally. Organizations should begin auditing their products today to meet the **AI Act disclosure deadline** confidently and coherently.