

As conversational AI rapidly integrates into customer support and digital services, companies must navigate complex regulatory environments—especially with the forthcoming **EU AI Act** and its Article 50 transparency requirement. Providers like *Coruzant Technologies* and policy advisors including the *European Commission* and *European Data Protection Supervisor* have underscored the importance of clear and timely disclosures about AI involvement. But do the demands for **chat disclosure** differ from those for **voice disclosure**, especially when considering user experience and accessibility?

Understanding Article 50 Transparency Requirements

Article 50 of the EU AI Act centers on the obligation for AI system providers to be transparent about the involvement of AI in interactions with users. The goal: to ensure users do not mistake AI for a human and are aware when a system is collecting or processing their data.

- **Key principle:** Users must be informed "at the first point of interaction" when an AI system is used.
- **Scope:** Applies to high-risk AI systems but also encourages best practices for all AI deployments.
- **Provider vs Deployer Responsibility:** Providers—those who develop and maintain AI systems—are responsible for the initial disclosures, while deployers—companies who integrate this tech into their services—must also ensure disclosures are in place when using third-party AI.

For global companies targeting or serving EU users, Article 50 has **extraterritorial reach**, meaning even non-EU providers must comply when their AI affects EU residents.

Why Disclosure Matters: Chat vs Voice Interfaces

At a glance, chat and voice product interfaces might seem similarly conversational. But these modalities differ in how users perceive and interact with them, which directly impacts how disclosures should be framed and timed.

Chat Disclosure: The Visible Context

Chat interfaces predominantly involve written text. Disclosures can be integrated visibly within the conversation window or in separate UI elements without disrupting flow:

- **Visibility:** Disclosure text can be seen, read, and even referenced later by users.
- **Screen Reader Compatibility:** Assistive technologies such as *screen readers* can parse and vocalize disclosure copy if properly coded.
- **Timing:** Since chat interfaces often entail short bursts of interaction, presenting disclosure copy upfront as part of the initial greeting or displayed message is effective.

For example, a chat bot from Coruzant Technologies might begin with: *"Hello! I am an AI assistant here to help you. By continuing, you consent to data processing per our privacy policy."* This is straightforward, accessible, and within expectations for chat users.



Voice Disclosure: The Audible Experience

Voice interfaces, conversely, rely on sound and typically present a one-way auditory interaction at first. This modality introduces unique challenges:

- **Limited Attention Span:** Listeners may lose interest if the disclosure is too long or opaque.
- **Sequential Interaction:** Users cannot "skim" voice disclosures, so every word matters enormously.
- **Accessibility Implications:** Users relying on voice assistants may have additional impairments; disclosure must be clear and concise.

Rather than a long verbose statement, voice product interfaces need disclosures phrased as concise, clear statements that can be comfortably heard and understood in a few seconds. For instance:

"Hi! I'm your AI assistant. I'll be listening and may process what you say to assist you."

Here, the use of simple language and natural speech mirrors how voice assistants introduce themselves, following best practices that mitigate confusion.

Provider Responsibility vs Deployer Responsibility

The regulatory demand places clarity on both AI system *providers* and *deployers*. Providers such as Coruzant Technologies—who build [Helpful hints](#) and maintain AI engines—must embed transparency features within the design. This could be standard disclosure prompts or meta tags facilitating assistive tech interpretation.

Deployers—companies integrating AI-powered chat or voice assistants within their products—carry the responsibility of ensuring disclosures appear appropriately in their specific user journeys and contexts.

Role Example Responsibilities Disclosure Considerations Provider (e.g., Coruzant Technologies)

- Build default disclosure messages
- Enable accessibility compliance
- Maintain disclosure update processes
- Embed disclosures compatible with screen readers

- Provide easy-to-integrate disclosure options for deployers

Deployer (e.g., SaaS company using AI chat)

- Customize disclosures to match brand and audience
- Ensure disclosures occur at first interaction
- Monitor compliance and update messaging as needed
- Adapt disclosure timing for chat vs voice flows
- Account for assistive technology users

First Interaction Timing: When to Disclose?

Both the EU Commission and the European Data Protection Supervisor emphasize that AI disclosures must occur **at the first point of interaction**. But what qualifies as ‘first interaction’ differs between chat and voice:

1. **Chat:** The moment the chat window opens or when the user sends their first message. Best practice is to have the AI agent “introduce” itself immediately or ensure a clear visual disclosure is present.
2. **Voice:** Disclosing AI presence at the first audible response—for example, the greeting prompt—is critical. It’s important not to begin with a human-like conversational starter before revealing the AI aspect, as this risks misleading the user.

In practical terms, this means that a voice assistant should never start with a phrase like “Hi, how can I help you today?” with no mention that it is AI-operated. Instead, clarifying “I am your virtual assistant powered by AI” within the first seconds is required to meet Article 50’s transparency.

Accessibility and Assistive Technology Integration

Users who rely on *screen readers* for chat interfaces or other assistive technologies require special consideration to ensure disclosures are fully perceivable:

- Disclosures must be coded semantically using ARIA tags for screen readers to announce them at the appropriate moment.
- The text should be simple, jargon-free, and structured so that assistive devices do not skip or confuse the disclosure.
- Voice disclosures must anticipate users with hearing impairments who may rely on captions or transcripts, ensuring these mediums also present clear notices.

Far too often, accessibility is treated as an afterthought, resulting in support tickets caused by unclear UI and confusing AI presence. Incorporating these requirements into launch checklists—collaborating with legal and accessibility teams—is crucial to avoid compliance missteps and user frustration.

The Extraterritorial Reach: Non-EU Companies Beware

One of the most disruptive aspects for global SaaS and AI companies is the extraterritorial scope of the EU AI Act—meaning compliance extends to any AI system interacting with EU residents regardless of corporate headquarters.

This means companies deploying AI chatbots or voice assistants outside the EU but serving EU users must adopt Article 50 disclosure requirements. It’s an important consideration for companies planning global deployments,

reinforcing that:

- Disclosure copy and timing cannot be afterthoughts and must be localized and consistent.
- Legal teams must partner with UX teams early in the product lifecycle.
- Failure to comply risks regulatory penalties and damage to user trust.

Summary: Tailoring Disclosure Copy for Chat and Voice Interfaces

So, do we need different disclosure copy for chat vs voice? The answer is a nuanced “yes.” While the core transparency message remains consistent—informing users that AI is involved and how data may be processed—the modality shapes how that message is best delivered:

Aspect	Chat Disclosure	Voice Disclosure
Message Format	Text in conversation window, visible and revisit-able	Concise spoken statements, audible at greeting
Timing	Immediately on window opening or initial message	Within first audible response, before substantive dialogue
Accessibility	Screen reader-friendly text and proper semantic markup	Clear voice articulation and availability of transcripts/captions
User Expectation	Users expect visible disclaimers and can re-read	Users expect short, clear vocal intros, avoid overload

By respecting these differences and enforcing timely, clear disclosures, providers like Coruzant Technologies and deploying companies can meet the stringent requirements of the EU AI Act, honor the user’s right to transparency, and support accessible, trustworthy AI experiences.



Closing Thoughts

The world of conversational AI is evolving fast. As product managers and UX writers, our role in crafting disclosure copy is not just legal compliance—it’s about building trust, clarity, and accessibility into every customer interaction.

When launching new chat or voice AI products, align early with legal and accessibility experts, always test how the disclosure sounds aloud (yes, read it out loud like a voice assistant!), and remember the audience—especially those using assistive technology. After all, disclosures buried deep or delivered robotically only create confusion and support tickets caused by unclear UI. Let’s make transparency a delightful, clear experience for all.