Legal

AI Act: what you need to know as a customer

Regulation (EU) 2024/1689 (the AI Act) places obligations on both IonKon as provider and you as the deployer of your model. This overview is written for your management or IT team and summarises where each obligation lies, what IonKon delivers technically and what you need to ensure yourself.

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1. What the product is and is not

What it is

Your IonKon model is an internal assistant system, trained exclusively on the company documents you provide and operated on your own hardware within your network.

What it is not

It is not a high-risk AI system under Annex III of the AI Act and is not used for practices prohibited under the Regulation. If you plan a use case from one of these areas, for example candidate selection or creditworthiness assessment, talk to us before deployment (section 4).

2. Who holds which role

IonKon: provider

IonKon trains and delivers the system and is therefore the provider of the delivered AI system under the Regulation. As provider, IonKon in particular fulfils the labelling obligation under Article 50(2) (section 3).

You: deployer

You operate the system within your organisation and are therefore its deployer under the Regulation. As deployer, you in particular fulfil the obligations described in section 4.

Fine-tuning your model with LoRA uses only a fraction of the compute originally spent training the underlying base model. Under the Regulation, fine-tuning only turns the fine-tuner into a provider of its own base model once it reaches a substantial share of that original training compute; the LoRA adaptation falls far short of that threshold.

Assigning the provider and deployer roles depends on the circumstances of the individual case. If in doubt, have your specific role reviewed by a lawyer.

3. What IonKon delivers technically

- **Machine-readable, signed labelling of outputs**
  Every answer your system returns through its interface carries structured metadata that marks it as AI generated and cryptographically signs its origin. This fulfils the provider obligation under Article 50(2) and follows the voluntary EU code of practice on labelling of 10 June 2026, which recommends signed metadata as the benchmark.
- **A verification tool**
  Use it to verify the signature of any output independently of IonKon, at any time.
- **This documentation**
  This overview and the accompanying technical documentation support you in meeting your own obligations as deployer (see our terms and conditions, section 14).

4. What you as the customer need to ensure

A visible notice in the interface

If you use the interface delivered by IonKon, the notice that users are writing with an AI system is already set up; you do not need to implement it yourself. It appears in both German and English as a bar along the top edge, on every page and permanently, and cannot be dismissed. It is produced by a component of our delivery, not by the interface. If you use your own interface, you must ensure there that users can recognise they are interacting with an AI system, unless this is already obvious (Article 50(1)).

Purpose limitation

Use the system within its intended purpose: as an internal assistant system based on your own company documents.

AI literacy of your staff

Providers and deployers must take measures to foster the AI literacy of the people who work with the system or use its outputs (Article 4). Since the Digital Omnibus recast, no specific level of knowledge for individuals is prescribed. The obligation has applied since 2 February 2025; market surveillance authorities have been enforcing it since 2 August 2026.

No prohibited or high-risk use without prior agreement

Using the system for practices prohibited under the AI Act, or as a high-risk AI system under Annex III, requires prior agreement with IonKon (see our terms and conditions, section 14).

5. What the labelling does and does not achieve

The labelling is attached to the answer returned by your system's interface, not to the text itself. As long as an answer is displayed in your application or further processed through the interface, it can be recognised as AI generated and its signature can be verified.

If someone copies the plain text into an email, a document or another system, the labelling does not travel with that copy; the copied text alone no longer shows that it originated from an AI system.

This matches the wording of the Regulation itself: Article 50(2) requires labelling to the extent technically feasible.

6. How to verify the labelling

The verification tool delivered with your system reads an output's metadata and checks its signature against your system's public key; the result is a simple yes or no. A short guide is included with the delivery.

7. Deadlines at a glance

Date	What applies	Status
2 February 2025	Article 4: foster AI literacy, for providers and deployers	in force
2 August 2026	Article 50: transparency and labelling obligations	in force
2 December 2027	High-risk obligations for systems under Annex III	postponed (Digital Omnibus)
2 August 2028	High-risk obligations for AI systems embedded in products	postponed (Digital Omnibus)

The Digital Omnibus (Regulation (EU) 2026/1744, in force since 27 July 2026) postponed the high-risk obligations and recast Article 4. The transparency obligations under Article 50 are not affected.

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8. Version and updates

As of 12 August 2026. This document is updated when the legal situation or our technical implementation changes.