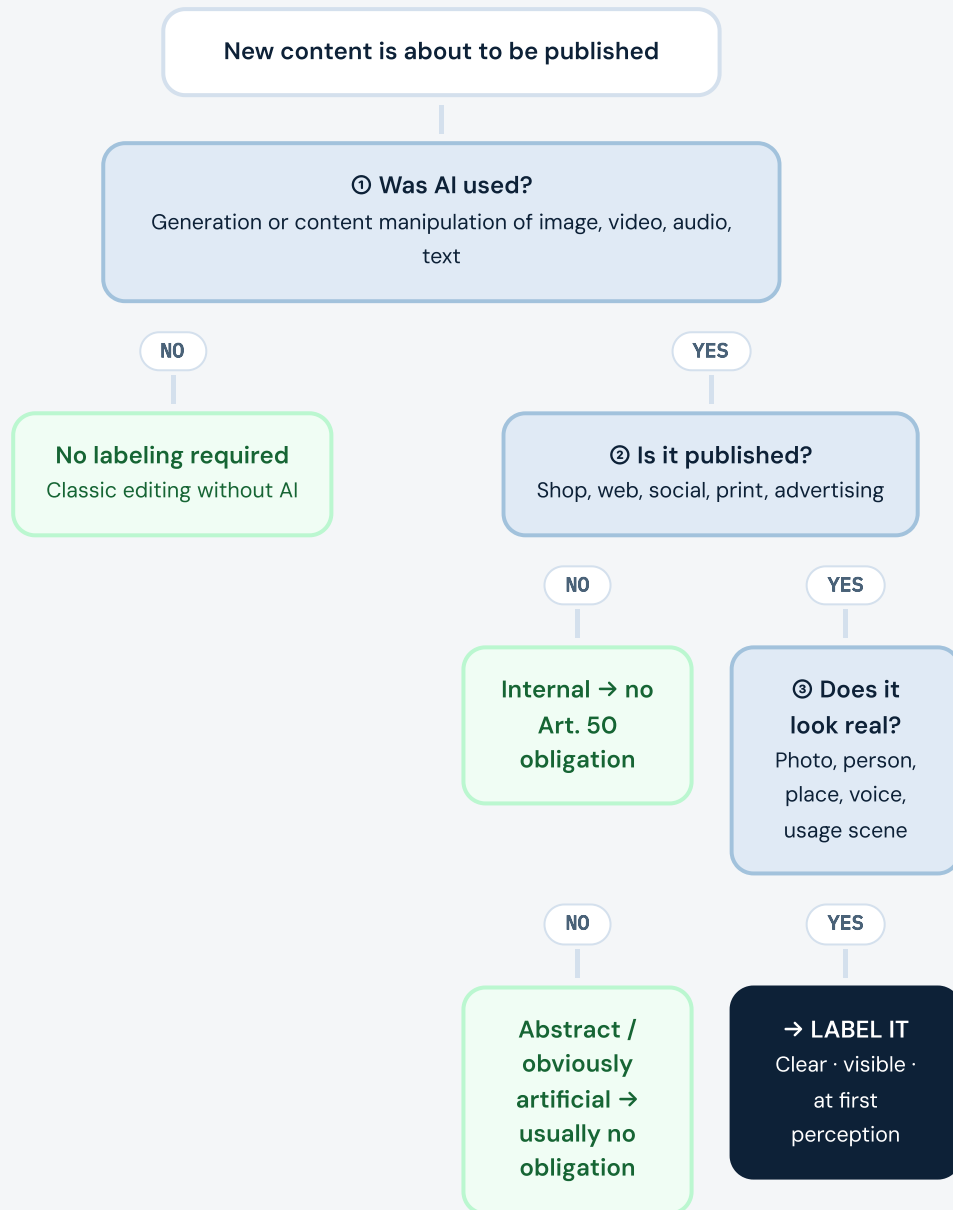


AI Labeling Quick Checklist

The Decision Tree

Follow the paths from top to bottom



Examples for classification



Label it

AI lifestyle mockup · Virtual model · AI voice-over · AI background swap · Before/after with AI · AR try-on · AI chatbot



Not necessary

Cutout + color correction · Schematic graphics · Icons · pure ad copy · internal AI tools · legacy content before 08/2026 unchanged

AI Labeling — Quick Checklist

✗ Yes — label it

✓ No — not necessary

? In doubt / special case

Rule of thumb: It's not about "AI yes/no", but about the **impression of authenticity**. Metadata or watermarks alone are not enough — the notice must be visible/audible to people.

Content type — basic rules

□	CONTENT / USE	REQUIRED?	NOTE
☐	Fully synthetic AI images (Midjourney, DALL-E, Stable Diffusion, AI lifestyle mockups)	YES	AI-generated, often looks realistic
☐	AI-manipulated images/videos/audio (generative fill, background swap, remove/add objects, ML skin smoothing)	YES	AI alters image content → deepfake risk
☐	Classic image editing without AI (color, light, contrast, cutout, pixel-based retouching)	NO	No AI model used
☐	Product photos, only technically optimized (noise reduction, exposure, sharpening, neutral background)	NO	Substantive content unchanged
☐	Product photos, content altered (objects/people/places/situations added, removed, recolored)	YES	Alters authenticity
☐	Schematic graphics, infographics, icons (recognizably graphic, not a real photo)	NO	No deceptively realistic reference
☐	Virtual models / usage scenes that look like real photos	IN DOUBT	Could be mistaken for a real photo
☐	Motifs on T-shirts, mugs, etc.	ONLY IF REALISTIC	Photorealistic/authentic-looking → Yes Abstract/stylized → No
☐	AI voice / AI voice-over (product video, ad, podcast)	YES	Audio deepfake — notice at the start + in the video
☐	AI chatbot / AI assistant on a website	YES	Users must recognize AI at first interaction (unless obvious)
☐	Pure product/ad copy, instructions, FAQs	NO	Not a matter of public interest — usually no obligation
☐	AI text on matters of public interest (politics, health, science)	YES	Exception: human-reviewed + editorial responsibility named

AI Labeling — Quick Checklist

Online shop — scenes

☐	SCENE IN THE SHOP	REQUIRED?	PRACTICAL TIP
☐	Main image: AI-generated lifestyle mockup	YES	Label directly on the image
☐	Detail view: cutout only, color correction	NO	Classic editing
☐	Size/usage example (model on sofa, AI background)	YES	If a realistic photo
☐	Schematic diagrams (dimension sketch, icon set)	NO	Obviously graphic
☐	Before/after (wrinkles/smoothing, body shapes) with AI	YES	Significantly alters authenticity
☐	Review photos, AI-retouched (skin, lighting, background)	YES	AI manipulation + realistic impression
☐	360° view with AI additions (missing angles generated)	YES	AI fills in content
☐	AR try-on / room placement (AI-based)	YES	Synthetic overlay, looks real
☐	Trust elements (logos, certificates) — AI-faked	SPECIAL CASE	No AI Act obligation, but risky under competition law

AI Labeling — Quick Checklist

Campaign & social media

☐	CAMPAIGN ELEMENT	REQUIRED?	NOTE
☐	Social post image (AI-generated, realistic)	YES	Deepfake logic
☐	Social post image (illustration / comic / abstract)	NO	Obviously artificial
☐	Influencer content with AI model/person (photorealistic)	YES	Could be mistaken for a real person
☐	Display banner with AI photo (person/place/usage scene)	YES	Label visible in/near the banner
☐	Video ads with AI narrator or virtual model	YES	Audio and/or visual deepfake
☐	Video ads with classic post-production (cut, color, no AI)	NO	No AI generation/manipulation
☐	YouTube description / post caption as the only notice	NO – not enough	Notice must be visible on the content itself
☐	Chat ads / conversational ads (AI bot)	YES	Recognizable as AI at first interaction
☐	Social post text on public-interest topics (news, politics, health)	YES	Exception: editorially responsible
☐	Pure product advertising, promo, sale	NO	Not a matter of public interest — usually no obligation

Print & offline

☐	PRINT ELEMENT	REQUIRED?	WHY / HOW
☐	Flyer / poster with AI photo (person/place/scene, realistic)	YES	Deepfake logic also applies offline
☐	Flyer / poster with illustration / 3D render (obviously artificial)	NO	No deceptively realistic impression
☐	Product catalog: AI lifestyle scenes (living room, model)	YES	Label in/near the image
☐	Packaging: AI-generated motif (person/place/event)	YES	Notice on/near the packaging
☐	Packaging: abstract pattern, icons, typography	NO	Obviously not real
☐	Print ad (newspaper/magazine) with AI photo	YES	Label in the image area or caption
☐	Inserts with AI-voice QR video	YES	Notice in the video / QR landing page
☐	Synthetic testimonials / expert statements (AI person/AI voice)	YES	Deceptively real person/opinion
☐	Clearly "fictional scenes" (cartoon, comic, obviously staged)	NO	Obviously artificial/fictional

AI Labeling — Quick Checklist

Phone & interaction

□	SCENARIO	REQUIRED?	IMPLEMENTATION
☐	Outgoing calls with AI voice / AI assistant	YES	State clearly at the start of the call
☐	Hotline with AI voice bot	YES	"You are connected to an AI assistant."
☐	Human agent with AI tools (transcript, suggestions, no AI voice)	NO	User is speaking with a human
☐	AI voice that sounds like a known person	YES + RISK	Clear notice + check unfair-competition and personality-rights law

Internal & special cases

SCENARIO	REQUIRED?	SCENARIO	REQUIRED?
Internal AI tools without publication	NO	Product with an AI feature (chatbot, image generator)	YES
Internal reports / presentations	NO	Software/code generated by AI	NO
Legacy content from before 02 Aug 2026, unchanged online	NO	High-risk AI (medicine, scoring)	OTHER OBLIGATIONS
Legacy content re-published / changed	CHECK	Labeling replaces rights clearance	NO

AI Labeling — Quick Checklist

How to label — web & print

AI-generated image

AI GENERATED

AI MODIFIED

AI-generated voice

This video contains AI-generated content

Web (shop, landing page, social)

- Label **directly on the image/video** or immediately below it
- In the visible product area — not in the T&Cs or at the end of the description
- Videos: label **at the start** + repeat regularly
- Audio: spoken notice at the beginning
- EU icon set optional, but icon + text recommended
- Caption/description alone is **not** enough

Print (flyer, catalog, packaging)

- Notice in/near the image or as a caption
- Packaging: label, tag, insert or back
- If artistic/fictional: more discreet, but present
- QR video: notice in the video itself or on the landing page
- Same deepfake logic as online

Phone & chat

- AI call: state clearly at the start
- Chatbot: recognizable at first interaction
- Wording: "You are speaking with an AI-driven assistant"

Text

- Pure ad copy: usually no obligation
- Unless the ad itself informs about public-interest topics (health, politics): then label it
- Exception: human-reviewed + a responsible person named

Checklist before publishing

☐	CHECK ITEM
☐	AI use identified (generation or content manipulation)?
☐	Content is being published (not just internal)?
☐	Checked for authenticity impression — does it look like a real photo/person/place/voice?
☐	If required: notice placed clearly, understandably and visibly/audibly?
☐	For video/audio: notice at the start (not only at the end)?
☐	For print: notice in/near the motif or on the packaging?
☐	Rights checked (personality, copyright, trademark law) — labeling does not replace this?
☐	Accessibility: sufficient contrast, alt text for screen readers?

Legacy content: Content published before 02 Aug 2026 that remains unchanged does not need to be labeled retroactively. Re-published or substantially changed → check again.