

AI Labeling Traffic-Light Cards

-  **Label it**
-  **Not necessary**
-  **In doubt / special case**

1	2	3
AI used?	Published?	Looks real?

WEB & SHOP

 LABEL IT AI lifestyle main image Deceptively real → label on the image <i>Also: AI background, generated usage scene</i>	 NOT NECESSARY Cutout + color correction Classic editing, substantive content unchanged
 LABEL IT Model on sofa, AI background Realistic usage scene	 NOT NECESSARY Dimension sketch, icon set Obviously graphic, no reference to reality
 LABEL IT Before/after with AI Wrinkles, smoothing, body shapes — alters authenticity	 LABEL IT 360° with AI additions Missing angles generated
 LABEL IT AR try-on / room placement Synthetic overlay, looks real	 LABEL IT AI voice-over in product video Audio deepfake → label in the video
 SPECIAL CASE Trust elements AI-faked No AI Act obligation, but risky under competition law	 LABEL IT AI chatbot on website Recognizable at first interaction (unless obvious)

CAMPAIGN & SOCIAL

 LABEL IT Social post, realistic AI photo Deepfake logic	 NOT NECESSARY Illustration / comic / abstract Obviously artificial
 LABEL IT Video ad with AI narrator / virtual model Audio + visual deepfake	 LABEL IT Influencer content with AI person Could be mistaken for a real person
 NOT ENOUGH Caption / description as the only notice Notice must be visible on the content!	 NOT NECESSARY Pure product advertising, promo, sale Not a matter of public interest — usually no obligation

Print · Phone · Text

PRINT & OFFLINE

● **LABEL IT**

Flyer/poster with AI photo

Deepfake logic applies offline too · label in the image area

● **NOT NECESSARY**

Illustration / 3D render, obviously artificial

No deceptive impression

● **LABEL IT**

Catalog: AI lifestyle scenes

Label in/near the image

● **LABEL IT**

Packaging: photorealistic AI motif

Label, tag, back

● **NOT NECESSARY**

Abstract pattern, icons, typography

Obviously not real

● **LABEL IT**

Synthetic testimonials / experts

Deceptively real person/opinion

● **ONLY IF REALISTIC**

Motifs on T-shirts, mugs

Photorealistic → Yes · Abstract/stylized → No

● **NOT NECESSARY**

Cartoon, comic, fictional scenes

Obviously artificial/fictional

PHONE & OTHER

● **LABEL IT**

AI calls / AI hotline

State clearly at the start of the call

● **NOT NECESSARY**

Human + AI helper tools

No AI voice in use

● **LABEL IT + RISK**

AI voice that sounds like a known person

+ check unfair-competition and personality-rights law

● **NOT NECESSARY**

Internal AI tools without publication

No Art. 50 obligation

● **CHECK**

Legacy content re-published / changed

Unchanged before 08/2026 → not required retroactively

● **LABEL IT**

AI text: politics, health, science

Exception: editorially responsible + reviewed

LABEL EXAMPLES

AI-generated image

AI GENERATED

AI MODIFIED

AI-generated voice

You are speaking with an AI assistant