

EU AI Act – Provisions & Risk Classification

Part 2 of the Privacy Policy of Bernadotte Consulting – our use of Artificial Intelligence under the EU AI Regulation (Regulation (EU) 2024/1689)

Last updated: June 2026 (Version 1.0) · updated on an ongoing basis

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1 · Scope of this Part

This Part 2 supplements our Privacy Policy with information on how we handle Artificial Intelligence (AI). It describes the principles under which Bernadotte Consulting uses AI, how we classify AI applications by risk, and which obligations the EU AI Act (Regulation (EU) 2024/1689) provides for. Where personal data is processed in connection with our use of AI, the provisions of Part 1 (Privacy Policy) and the GDPR apply in addition.

Ongoing updates: The EU AI Act becomes applicable in stages and is continuously specified by guidelines, standards and national rules. We therefore review these provisions regularly and amend them as required. The current version published on our website applies in each case.

Our principles for using AI

- Transparency: Where you interact directly with AI (e.g. an AI assistant), we make this recognisable.
- Human oversight: AI outputs are reviewed and accountable before they are used.
- Data minimisation: No special categories of personal data are entered into AI tools without a legal basis.
- No training with your data: We choose providers that do not use inputs to train AI models (no-training principle).
- No prohibited practices: We do not use AI-based social scoring, manipulative systems or impermissible biometric techniques.



2 · Risk classification under the EU AI Act

The EU AI Act classifies AI systems according to their risk. The following classification shows the four levels and how Bernadotte Consulting handles each of them.

Unacceptable risk – prohibited (Art. 5)

Are such systems used?

- Examples: social scoring, manipulative systems, untargeted scraping of facial images.
- How we handle it: fully excluded – such systems are not used.

High risk (Annex III, Art. 6)

Are high-risk applications used?

- Examples: AI in recruitment, credit scoring, critical infrastructure.
- How we handle it: currently not in use. Before any future use we assess the specific obligations separately.

Limited risk – transparency obligation (Art. 50)

Do transparency obligations apply?

- Examples: AI assistants/chatbots, AI-generated or edited text, images, audio, video.
- How we handle it: we label AI contact points and AI-generated content where required.

Minimal risk

Standard use without specific obligations?

- Examples: general writing and research assistance, internal productivity tools.
- How we handle it: the main area of our use – responsibly and with assured AI literacy in the team.



3 · Classification of our AI applications

Based on the four levels, we classify below the AI applications actually used at Bernadotte Consulting – with the reason and the resulting measure. This makes it transparent which risk level each application falls into.

AI application	Risk level	Reason	How we handle it
Text & research assistance (text, concepts, documents, research)	Minimal	General productivity without decisions about individuals.	Human review of outputs; no special data without a legal basis; AI literacy in the team.
AI image/video/audio creation (avatar videos, social clips, images, voiceover)	Limited	Generates synthetic content – transparency obligation under Art. 50.	Labelled as AI-generated/edited where required; no misleading deepfakes of real people.
Chatbot / AI assistant (website or customer contact)	Limited	Direct AI contact with people – transparency obligation under Art. 50.	Clear notice that it is AI; human handover possible where needed.
Recruitment/applicant screening, credit scoring, etc.	High	Would be high-risk under Annex III.	Currently NOT in use. Separate assessment of high-risk obligations before any introduction.
Prohibited practices (e.g. social scoring)	Prohibited	Impermissible under Art. 5.	Fully excluded – not used.

Result: our day-to-day use sits in the “minimal” and “limited” levels. We do not use high-risk applications or prohibited practices. For new applications we re-assess the classification in advance.



4 · Key provisions and deadlines

The EU AI Act entered into force on 1 August 2024 and becomes applicable in stages. The following dates are relevant to our use of AI.

Date	Key provision	Relevance for us
02 Feb 2025	Prohibition of certain AI practices (Art. 5) and the AI literacy obligation (Art. 4).	In force. Prohibitions are observed; our team has the required AI literacy.
02 Aug 2025	Rules for general-purpose AI models (GPAI), governance and penalties.	We use compliant AI tools only.
02 Aug 2026	The majority of the remaining obligations, in particular transparency duties (Art. 50).	Central deadline: labelling of AI contact points and AI-generated content.
02 Aug 2027	Obligations for certain high-risk systems (Art. 6(1)).	Relevant only if high-risk applications are used in future.

Transparency for AI content and AI contact (Art. 50)

- When you interact directly with an AI system (e.g. a chatbot), we inform you that it is AI – unless this is already obvious.
- AI-generated or substantially altered image, audio or video content (so-called deepfakes) is marked as artificially generated.
- AI-generated text intended to inform the public is labelled accordingly, unless editorial responsibility applies.



5 · Supervision, your rights and contact

Competent supervisory authority (Luxembourg)

As a company established in Luxembourg, we are subject to Luxembourg supervision under the EU AI Act. The data protection authority CNPD plays a central role; transparency obligations relating to AI-generated content are additionally overseen by the media authority ALIA.

Your rights

Where personal data is processed in connection with our use of AI, you have the rights set out in Part 1 (Privacy Policy) – in particular access, rectification, erasure, restriction, data portability and objection.

Contact

For questions about our use of AI and about these provisions, you can reach us at sale@bernadotte-consulting.com.

Last updated: June 2026 (Version 1.0). These EU AI Act provisions are reviewed on an ongoing basis and adapted to the progressive application of the Regulation. The current version published on our website applies in each case.