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EU AI Act Reference

After the Digital Omnibus | Generated 15 Nov 2026

Key dates, penalties, and definitions as of July 2026. Orientation and internal training, not legal advice. The Digital Omnibus received final Council approval on 29 June 2026 and is awaiting publication in the Official Journal.

Key dates

2 Feb 2025 Prohibited uses and AI literacy	In force
2 Aug 2025 GPAI model rules and governance	In force
2 Aug 2026 Transparency (Article 50)	This August
2 Dec 2026 New prohibitions (intimate imagery, CSAM)	New
2 Dec 2027 High-risk (Annex III), moved from Aug 2026	Deferred
2 Aug 2028 High-risk embedded (Annex I), moved from Aug 2027	Deferred

Penalties

Prohibited practices (Article 5)	Up to €35 million or 7% of worldwide annual turnover, whichever is higher
Most other obligations, incl. high-risk and transparency	Up to €15 million or 3%
Incorrect or misleading information to authorities	Up to €7.5 million or 1%

For SMEs and start-ups, the lower of the fixed amount or the percentage applies.

Glossary

Provider	Develops an AI system or general-purpose model and places it on the market under its own name.
Deployer	Uses an AI system under its own authority in a professional setting. Most organizations are deployers.
GPAI	A general-purpose AI model that can handle many tasks and be built into other systems.
Annex III	The list of high-risk use areas: employment, credit, biometrics, education, essential services.
Conformity assessment	The check that a high-risk system meets the Act's requirements before it goes on the market.
FRIA	A fundamental rights impact assessment, required of certain deployers of high-risk AI (Article 27).
DPIA	A data protection impact assessment under the GDPR, often relevant alongside AI use.
Systemic risk	A category of the most capable general-purpose models, which carry extra obligations.
AI literacy	A suitable level of understanding of AI among the people who use it (Article 4).
Transparency obligation	The duty to disclose AI interaction and label AI-generated content (Article 50).
Digital Omnibus	The 2026 simplification package that deferred the high-risk deadlines and adjusted several duties.

Sources

European Commission, the AI Act — https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai

Council of the EU, agreement to simplify (7 May 2026) — https://www.consilium.europa.eu/en/press/press-releases/2026/05/07/artificial-intelligence-council-and-parliament-agree-to-simplify-and-streamline-rules/

EU AI Act, Annex III (high-risk areas) — https://artificialintelligenceact.eu/annex/3/

EU AI Act, Article 26 (deployer obligations) — https://artificialintelligenceact.eu/article/26/

EU AI Act, Article 50 (transparency) — https://artificialintelligenceact.eu/article/50/

Gibson Dunn, Omnibus agreement briefing — https://www.gibsondunn.com/eu-ai-act-omnibus-agreement-postponed-high-risk-deadlines-and-other-key-changes/

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