

As artificial intelligence becomes increasingly embedded in software products, clarity about AI features isn't just good practice—it's a regulatory mandate, especially in the European Union. Companies like **Coruzant Technologies** and regulatory bodies such as the **European Commission** and the **European Data Protection Supervisor** have sharpened focus on transparency and user trust, particularly under the *EU AI Act*.

If you're designing a multi-step onboarding flow, you might be wondering: *How and when should I disclose AI use? What are the key legal and UX considerations? How can I make the disclosure clear and distinguishable for all users, including those relying on assistive technologies?* This post breaks down best practices by combining regulatory requirements and user experience insights—so your AI onboarding disclosures hit the mark from first impression to final acceptance.

Why Onboarding Disclosure of AI Matters

When users first connect with your product, the onboarding flow shapes their understanding and expectations. Disclosing AI at this stage fulfills the **EU AI Act Article 50** transparency requirements. Article 50 mandates that providers and deployers of certain AI systems must clearly inform users that they are interacting with an AI and provide meaningful information about its capabilities and limitations.

Failing to disclose AI transparently can erode trust and may lead to enforcement actions by authorities like the **European Data Protection Supervisor**. Moreover, from a UX perspective, an unclear or buried AI disclosure risks confusing users and prompting support tickets—something I track closely in my experience shipping voice and chat products.

The EU AI Act's Article 50 at a Glance

- **Applicability:** Applies to “high-risk” AI systems and broadly impacts providers and deployers.
- **Core requirement:** Inform users about the AI interaction in a way that is *clear and distinguishable* from other UI elements.
- **Language:** Must use plain and accessible language accessible to people with different abilities.
- **Timing:** Disclosure must occur at *first exposure*—the earliest point users can interact with the AI system.

Provider Responsibility Versus Deployer Responsibility

Understanding who needs to disclose is key. Under the EU AI Act:

Role Responsibility for Disclosure Example **Provider**



(Entity that develops the AI system) Obligated to design and integrate disclosure mechanisms and ensure documentation exists. *Coruzant Technologies*, a provider building AI chatbots, must embed clear user notices in their product. **Deployer**(Entity that integrates AI into services) Must display disclosure information to end users, implement first-contact notifications, and comply with transparency. A SaaS company integrating Coruzant’s chatbot into their onboarding flow must ensure their UI delivers the AI disclosure clearly.

Both roles share enforcement risk, so coordination between providers and deployers is essential. Collaboration with legal and accessibility teams helps nail the timing, wording, and presentation of the disclosure.

Extraterritorial Reach: Beyond the EU Borders

One aspect often overlooked is that the EU AI Act’s transparency provisions have **extraterritorial reach**. If your AI system is available to EU users—even if your company is based outside the European Union—you must comply.

This global scope aligns with similar trends seen in data privacy law like the GDPR. For tech companies in the U.S., Asia, or elsewhere, this means carefully reviewing onboarding flows and disclosures for all EU-based users to avoid enforcement issues and maintain trust worldwide.

Timing Your AI Disclosure: The First-Interaction Imperative

“First exposure” means disclosing AI use at the *very first moment* a user encounters the AI system-driven feature. With a multi-step onboarding flow, this can be tricky. You want to balance early disclosure with onboarding smoothness and avoid overwhelming users.

Here’s a practical approach:

1. **At the start of onboarding:** Include a clear AI disclosure statement when the user is first introduced to AI-powered features, such as automated chat or voice assistance.
2. **Use progressive disclosure:** Follow initial notice with step-by-step explanations about what the AI can and cannot do as users proceed in the flow.
3. **Reminder before key interactions:** Before collecting sensitive data or decision-making steps influenced by AI, remind users of the AI involvement.

For example, Coruzant Technologies integrates a screen <https://coruzant.com/ai/ai-transparency-design-problem/> reader–friendly banner at the top of the onboarding page that says, “This system includes an AI-powered assistant to help guide you.” Users hear this read clearly when using voice product interfaces, and the banner includes a link to detailed info in accessible formats.

How to Make AI Disclosure Clear and Distinguishable

“Clear and distinguishable” is more than legal jargon—it’s a UX principle. Your AI disclosure should be instantly noticeable, easy to understand, and accessible across devices and user needs.

UI Best Practices for AI Disclosures in Onboarding

- **Visual prominence:** Use contrasting colors, readable font sizes, and icons with descriptive alt text to highlight the AI disclosure area.
- **Simple language:** Avoid technical or vague terms like “AI” without explanation. State clearly the role and limitations of the system in plain language.
- **Assistive technology compatibility:** Ensure disclosures are keyboard navigable and properly tagged for screen readers.
- **Multi-modal delivery:** Combine text with voice prompts or tooltips so that users relying on *voice product interfaces* understand the disclosure intuitively.
- **Persistent accessibility:** Provide access to disclosure details at any later step, not just initially, for users who want to revisit the info.

Accessibility Considerations

Companies deeply involved in accessibility, like the European Data Protection Supervisor, emphasize that onboarding flows must work for all users:



- Ensure AI disclosure is included in screen reader sequences without clutter or confusing navigation.
- Audio disclosure prompts should be succinct to avoid disrupting flow, yet complete enough to fulfill transparency.
- Use ARIA landmarks and roles properly, so voice assistants and screen readers can locate disclosures quickly.

Example: Effective Multi-Step Onboarding AI Disclosure

Let's walk through an example inspired by implementations from Coruzant Technologies and guidelines from the European Commission:

1. Step 1: Welcome Screen

- Text banner: "Welcome! This platform features an AI-powered assistant that helps personalize your journey."
- Screen reader announces the banner on load.
- Link to "Learn more about AI capabilities" presented as accessible button.

2. Step 2: Data Input

- Prompt: "Our AI analyzes your responses to tailor recommendations. You can opt-out anytime."
- Optional voice prompt repeats this information for users on voice interfaces.

3. Step 3: Confirmation

- Final disclosure reminder with checkbox: "I understand that AI is assisting in my experience."
- Accessible validation and error handling ensure disclosure acknowledgment before proceeding.

Partnering Across Teams for Compliance and UX Excellence

In my 12 years working with B2B SaaS companies, the most successful AI disclosure initiatives come through close collaboration:

- **Legal and compliance:** Review wording against EU AI Act requirements and related data protection laws.
- **Accessibility experts:** Test disclosures with screen readers and voice product interfaces to ensure all users receive clear messages.
- **Product and UX teams:** Prototype and A/B test disclosure placement and verbiage to minimize user friction while maximizing transparency.

This cross-functional alignment reduces "support tickets caused by unclear UI," a chronic UX headache when disclosures fall short. It also builds user trust from first interaction—a key to long-term engagement.

Summary Checklist for AI Disclosure in Onboarding Flows

Requirement	Best Practice	Tools/Considerations	Timing
First Exposure	Disclose AI before the user interacts with AI-powered features	Onboarding triggers, initial UI banners, voice interface prompts	Clarity and Distinguishability
Use simple language, visual emphasis, and clear UI elements	Contrast colors, icons with alt text, product copy	testing	Accessibility
Make disclosures screen reader and voice interface compatible	ARIA roles, keyboard navigation, voice UI scripting	Provider and Deployer	Roles
Coordinate disclosure responsibilities between parties	Legal reviews, documentation sharing, UI integration plans	Extraterritorial Compliance	Comply for EU users regardless of company location
User geo-detection, localization strategies	User Control and Transparency	Explain AI capabilities and limitations; provide opt-out options	Progressive disclosure, accessible help links, consent checkboxes

Final Thoughts

Onboarding disclosures for AI aren't just about checking legal boxes—they're a fundamental part of respectful, trustworthy user experiences. By following the *EU AI Act's Article 50* transparency requirements and embracing UX best practices, you can create onboarding flows that clearly and distinguishably inform users from their first exposure onward.

Whether you're a provider like **Coruzant Technologies** or a deployer integrating AI into your product, focus on timing, language, accessibility, and seamless workflow integration. Such care not only reduces confusion and support burden but also aligns you with the evolving global landscape of ethical AI use.

And remember—always read your disclosure copy out loud to simulate how a voice assistant might introduce itself. It's a simple trick that helps catch unclear phrases and ensures your users hear transparency clearly.