

V6.250515

# Embedding the European AI Act the practical way (AIA)

## When developing medical games / gamification

Eindhoven, March 2026

Micha van der Meer BEc, MSc, CAICO &  
Wiley Finch MSc, CISSP, CAICO





## Wiley Finch MSc, CISSP, CAICO

[wiley.finch@inholland.nl](mailto:wiley.finch@inholland.nl)

Parttime AI, cybersecurity, software development & cloud teacher and researcher at Inholland University and Entrepreneur

Wiley started his IT career in 2016 and has since worked across educational and medical games, cybersecurity and applied AI. That cross-domain experience lets him turn complex legal requirements into practical engineering and product decisions.

His research produced the Least Responsible AI Controls Framework (LRAICF) and companion RegTech tools. Together they offer a lightweight, auditable route to EU AI Act compliance that is realistic and proportionate for low-capacity actors such as SMEs, small studios and public-sector teams.

Wiley is CTO of Unknown Data and an entrepreneur, lecturer and advisor (1x CEO, 1x CTO, 3x founder). He combines academic rigour with hands-on engineering to help teams build auditable, practical AI systems.





## **Micha van der Meer BEd, MSc, CAICO**

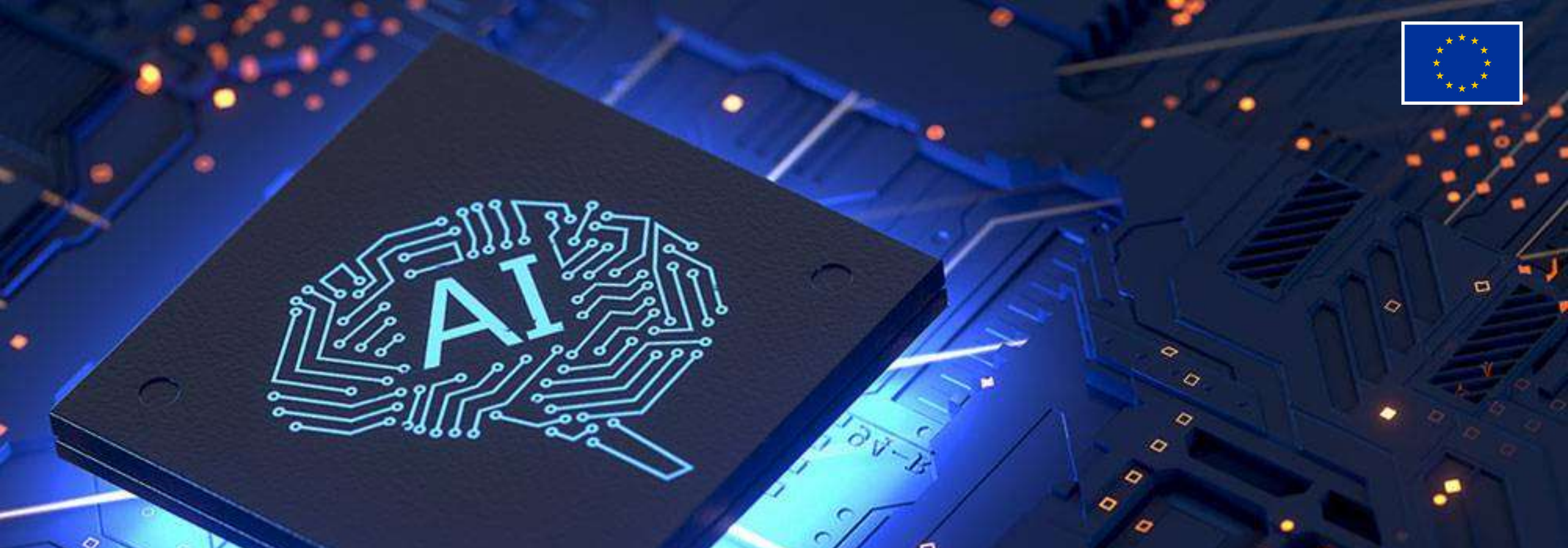
**[micha.vandermeer@inholland.nl](mailto:micha.vandermeer@inholland.nl)**

Parttime AI, cybersecurity, game engineering teacher and researcher at Inholland University

Micha van der Meer started in 1986 as assembly programmer on the commodore 64 as hacker and trader for Hotline, Fairlight and NATO/NEC. Scouted by a major game studio in 1987 he started as programmer.

Micha is a serial entrepreneur, technical evangelist and mentor, University lecturer and researcher, author of 3 university books, supervisory board member, 5x Founder, 3x CEO, 4x CTO, winner of many awards in different domains and realized 2x Exits as a CEO





## DEFINITION OF AI [EU]



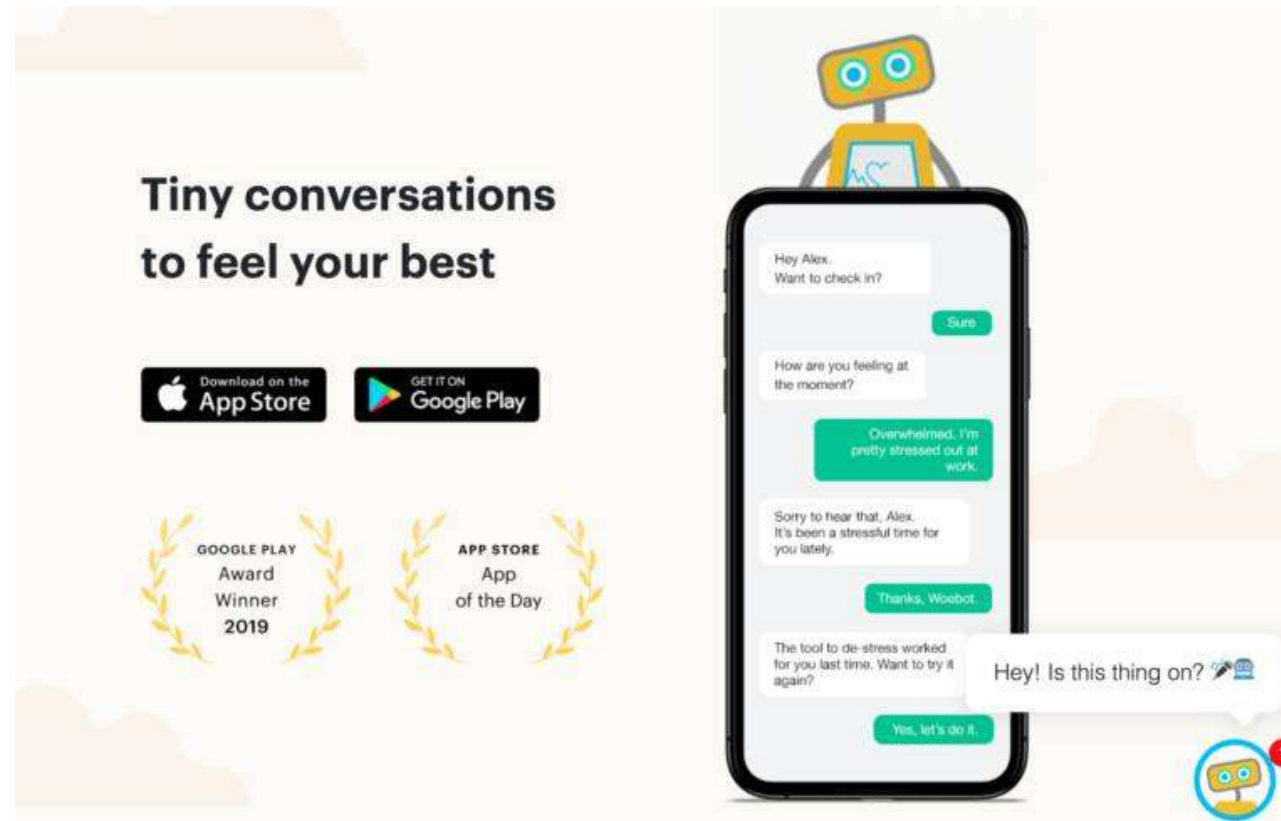
# What is an AI system according to the AI Act?



“AI system” means a **machine-based** system that is designed to operate with **varying levels of autonomy** and that may exhibit adaptiveness **after deployment**, and that, for **explicit or implicit objectives**, **infers**, from the input it receives, how to **generate outputs** such as predictions, content, recommendations, or decisions that **can influence physical or virtual environments**

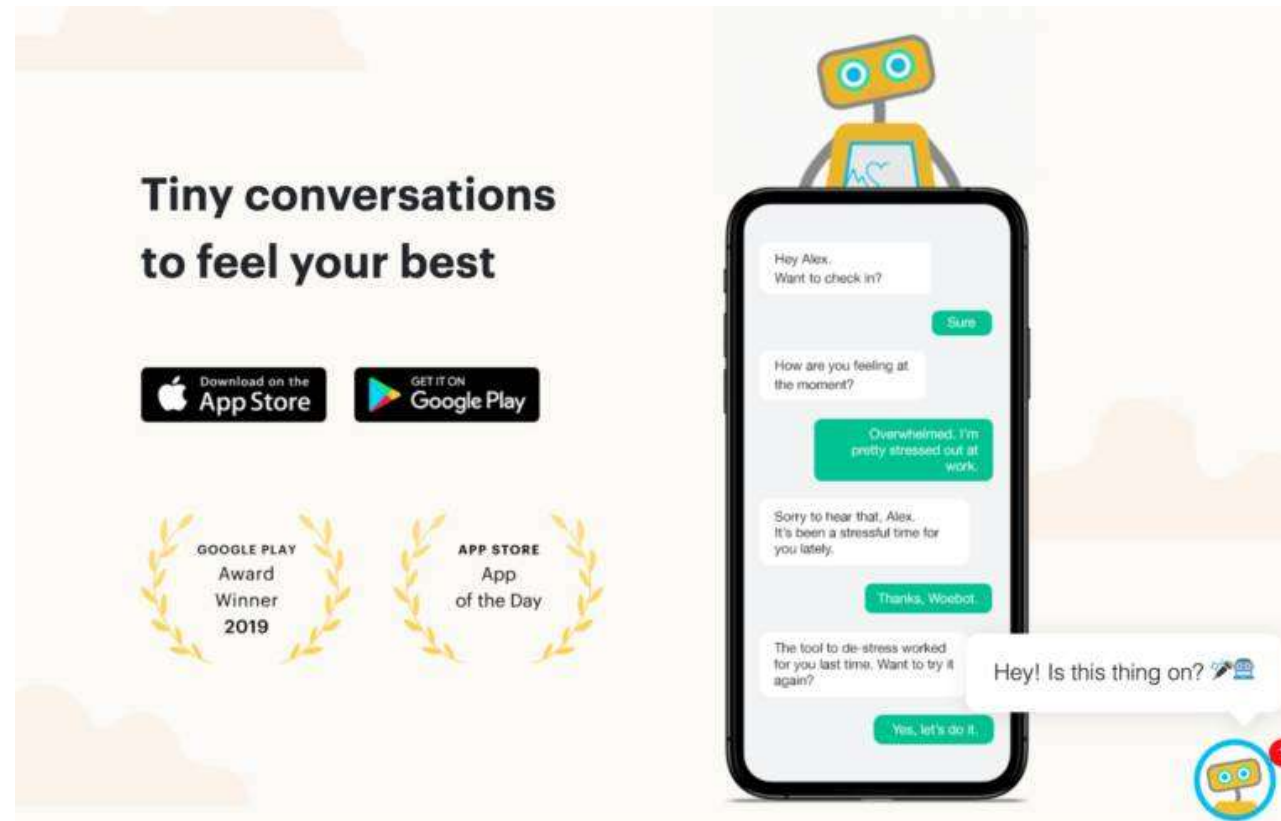
## FIRST Question; is it an AI system?

# What is an AI system according to the AI Act?



Woebot is a digital persona that acts as an AI-powered chatbot designed to provide mental health support through conversations based on principles of Cognitive Behavioral Therapy (CBT)

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AI

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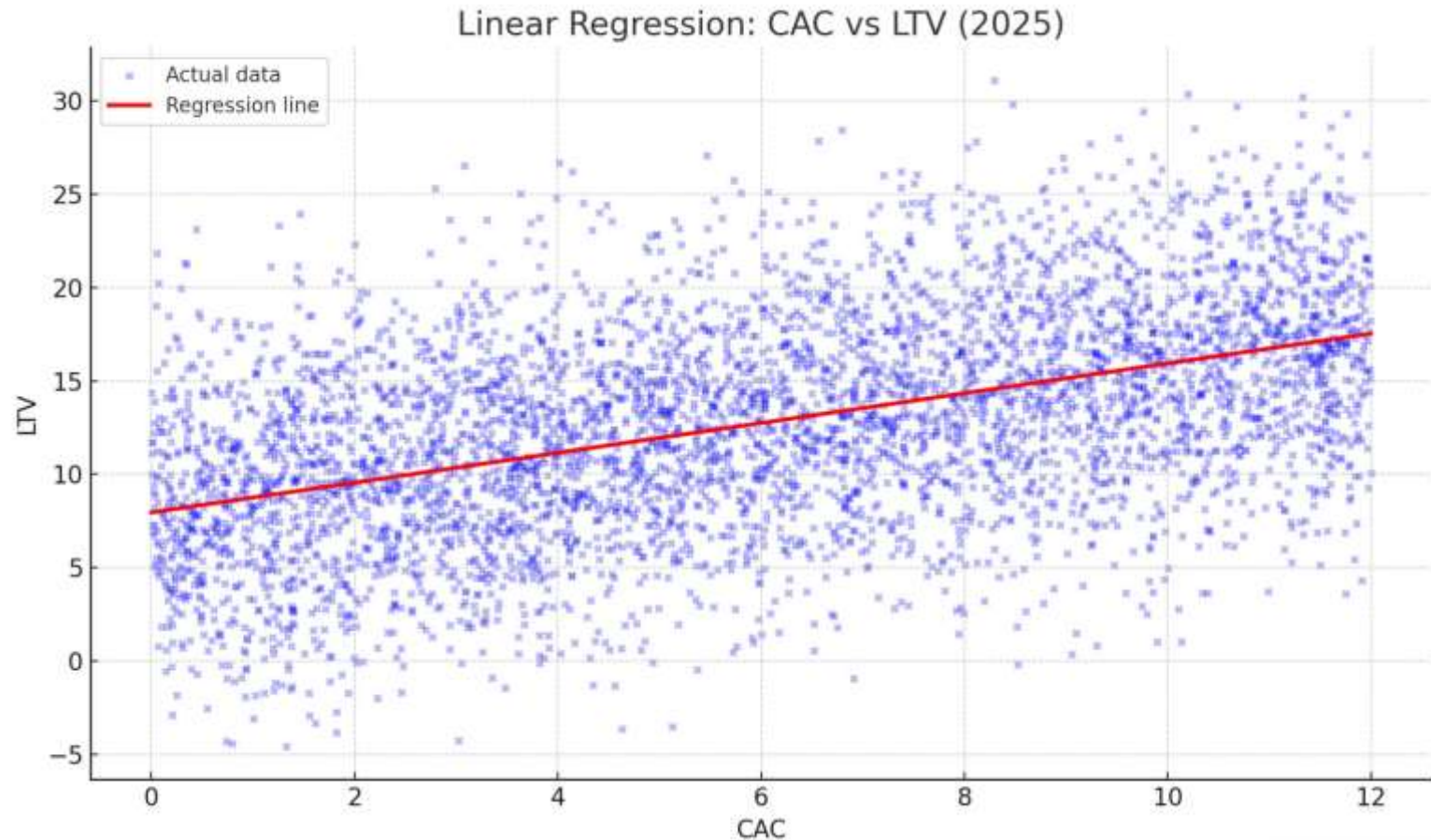
```
import numpy as np
import matplotlib.pyplot as plt
from sklearn.linear_model import LinearRegression

# Generate Linreg example
np.random.seed(0)
X_large = np.random.uniform(0, 12, 5000).reshape(-1, 1) # CAC values
true_slope = 0.8
true_intercept = 8
noise = np.random.normal(0, 5, 5000) # Noise to simulate variation

y_large = true_slope * X_large.flatten() + true_intercept + noise # LTV values

# Train the model
model_large = LinearRegression()
model_large.fit(X_large, y_large)

# Plot the data and regression line
plt.figure(figsize=(10, 6))
```



Linear Regression: Lifetime Value (LTV) vs Customer Acquisition Cost (CAC)

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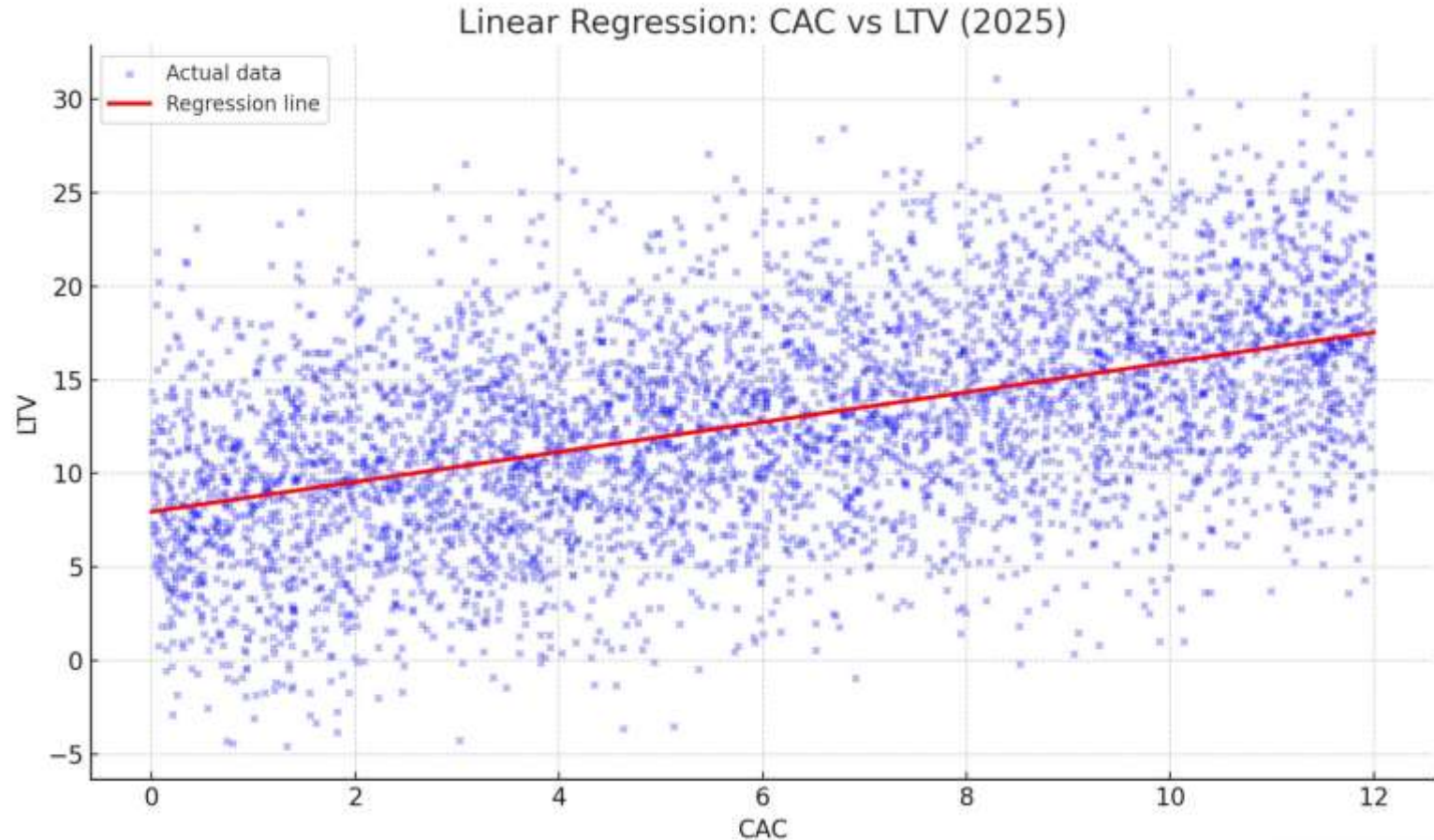
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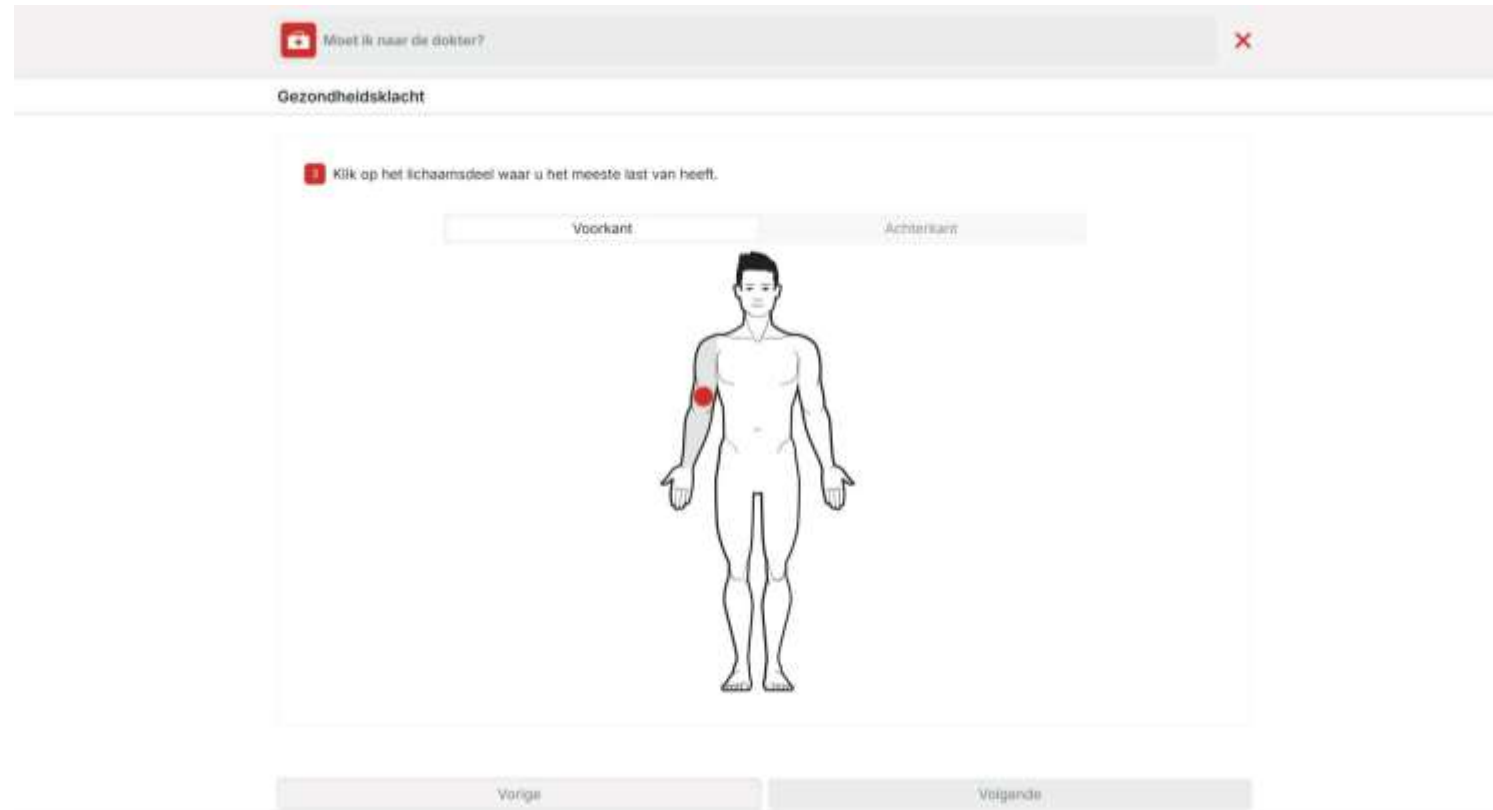


Linear Regression: Lifetime Value (LTV) vs Customer Acquisition Cost



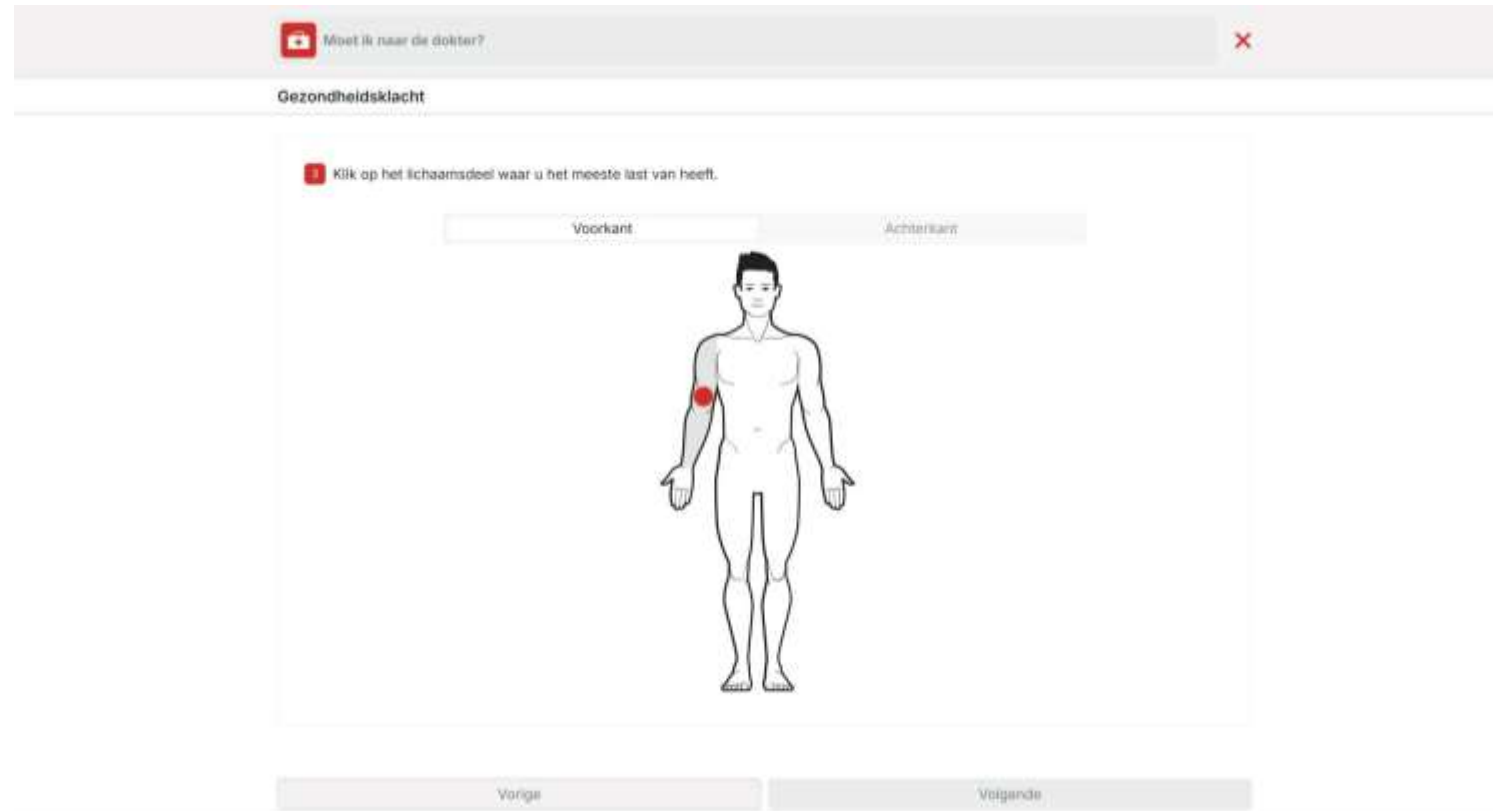
AI X ??

# What is an AI system according to the AI Act?



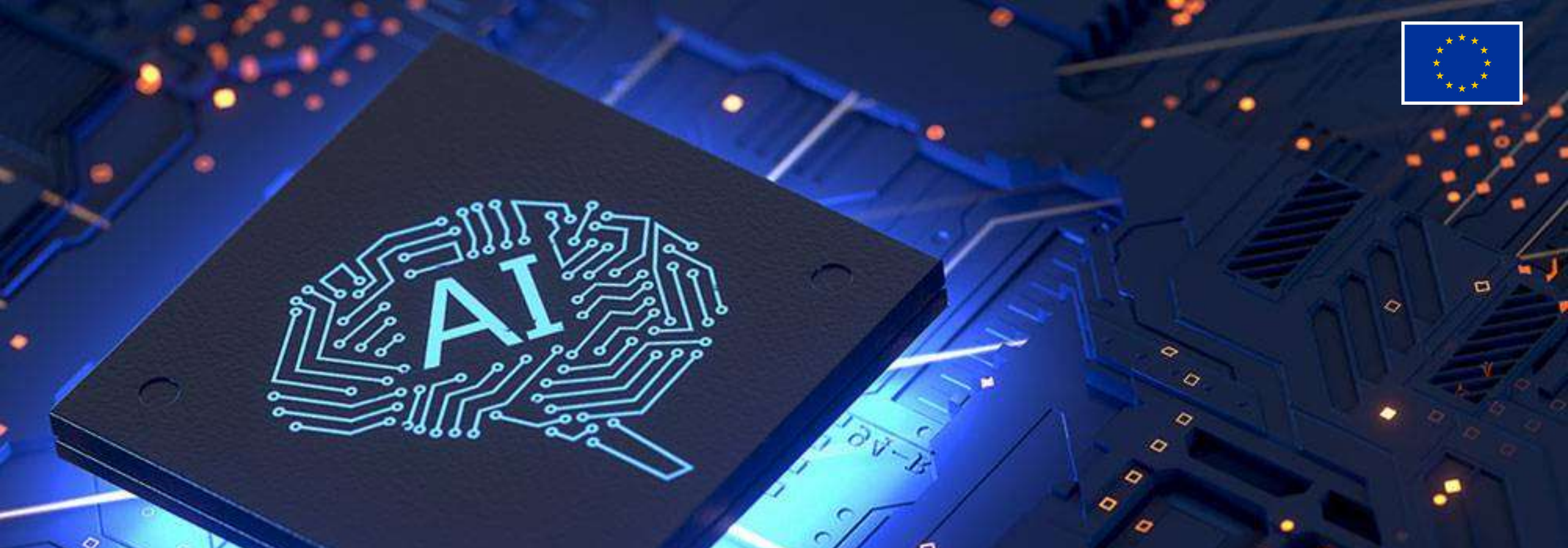
moetiknaardedokter.nl is a Dutch interactive application that through a series of pre-determined questions (rule-based) determines if you should see a doctor or not.

# What is an AI system according to the AI Act?



**X** NO  
AI

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## AIA IN A BIRD'S-EYE VIEW



# AIA Timeline (5 important dates)



**August 1, 2024**  
AIA into force

**Feb 2, 2025**  
Post entry.  
“Forbidden AI”

**Aug 2, 2025**  
1st year.  
“Notifying authorities”

**Aug 2, 2026**  
2nd year.  
“High Risk”

**Aug 2, 2027**  
3rd year.  
“All must comply”

# The 3 AIA (components) pillars



LAW



ETHICS



ROBUST

### Table of Contents

- Chapter I: General Provisions +
- Chapter II: Prohibited AI Practices +
- Chapter III: High-Risk AI Systems +
- Chapter IV: Transparency Obligations for Providers and Deployers of Certain AI Systems +
- Chapter V: General-Purpose AI Models +
- Chapter VI: Measures in Support of Innovation +
- Chapter VII: Governance +
- Chapter VIII: EU Database for High-Risk Systems +
- Chapter IX: Post-Market Monitoring, Information Sharing and Market Surveillance +
- Chapter X: Codes of Conduct and Guidelines +
- Chapter XI: Delegation of Power and Committee Procedure +
- Chapter XII: Penalties +
- Chapter XIII: Final Provisions +

[Privacy Policy](#) | [Liability](#)

# The EU AI Act

The EU Artificial Intelligence Act, the most comprehensive legal framework that sets out harmonised rules for the development, placing on the market, and use of artificial intelligence in the EU, has been published in the Official Journal of the EU on 12 July 2024 after more than three years negotiations and entered into force on 1 August 2024. The AI Act has a gradual enforcement timeline, and the majority of its provisions will start applying on 2 August 2026.

- Chapters: [Chapter I](#) [Chapter II](#) [Chapter III](#) [Chapter IV](#) [Chapter V](#) [Chapter VI](#) [Chapter VII](#)  
[Chapter VIII](#) [Chapter IX](#) [Chapter X](#) [Chapter XI](#) [Chapter XII](#) [Chapter XIII](#)

### Quick Access

- Chapter I — [Article 1, 2, 3, 4](#)
- Chapter II — [Article 5](#)
- Chapter III — [Section 1, 2, 3, 4, 5](#)
- Chapter IV — [Article 50](#)
- Chapter V — [Section 1, 2, 3, 4](#)
- Chapter VI — [Article 57, 58, 59, 60, 61, 62, 63](#)
- Chapter VII — [Section 1, 2](#)
- Chapter VIII — [Article 71](#)
- Chapter IX — [Section 1, 2, 3, 4, 5](#)
- Chapter X — [Article 95, 96](#)
- Chapter XI — [Article 97, 98](#)
- Chapter XII — [Article 99, 100, 101](#)
- Chapter XIII — [Article 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113](#)

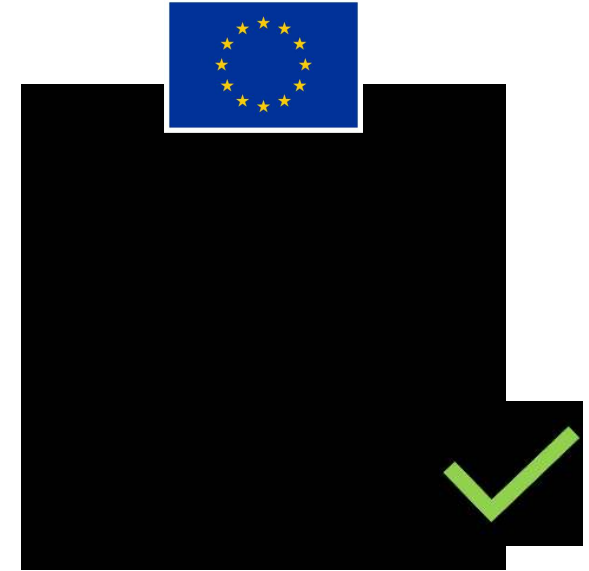
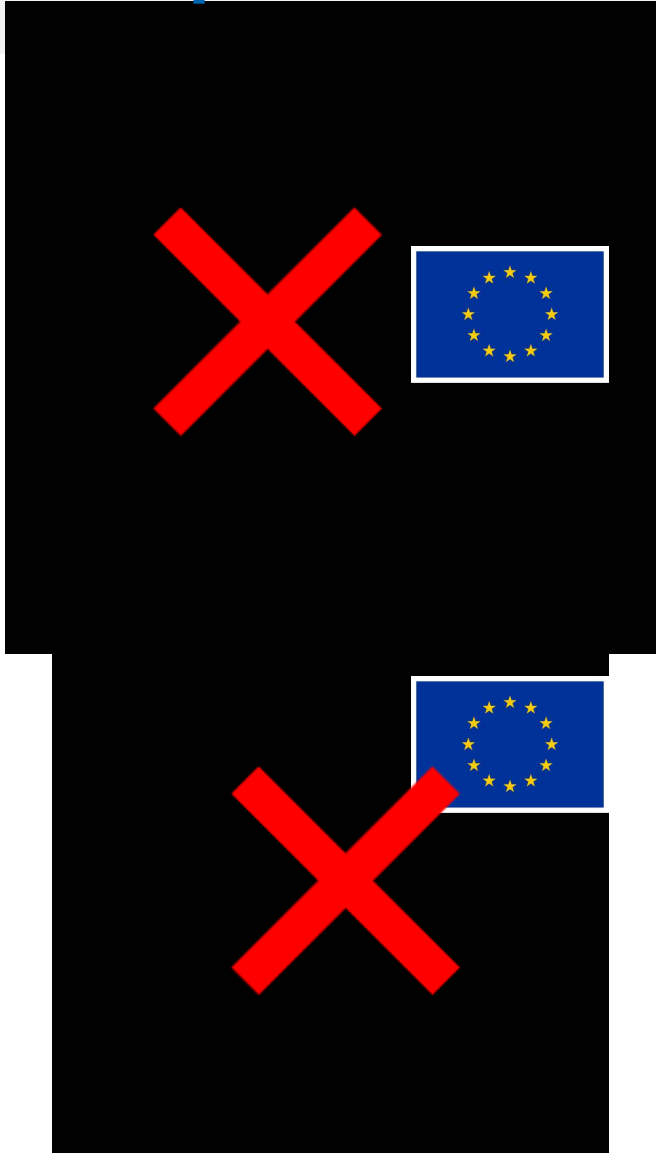
# Ethics ?



# Ethics in Europe?



# European AI ethics,.. Is all about





Ethical principles:

- Respect for human **autonomy**
- Prevention of harm
- **Fairness** and **explicability**



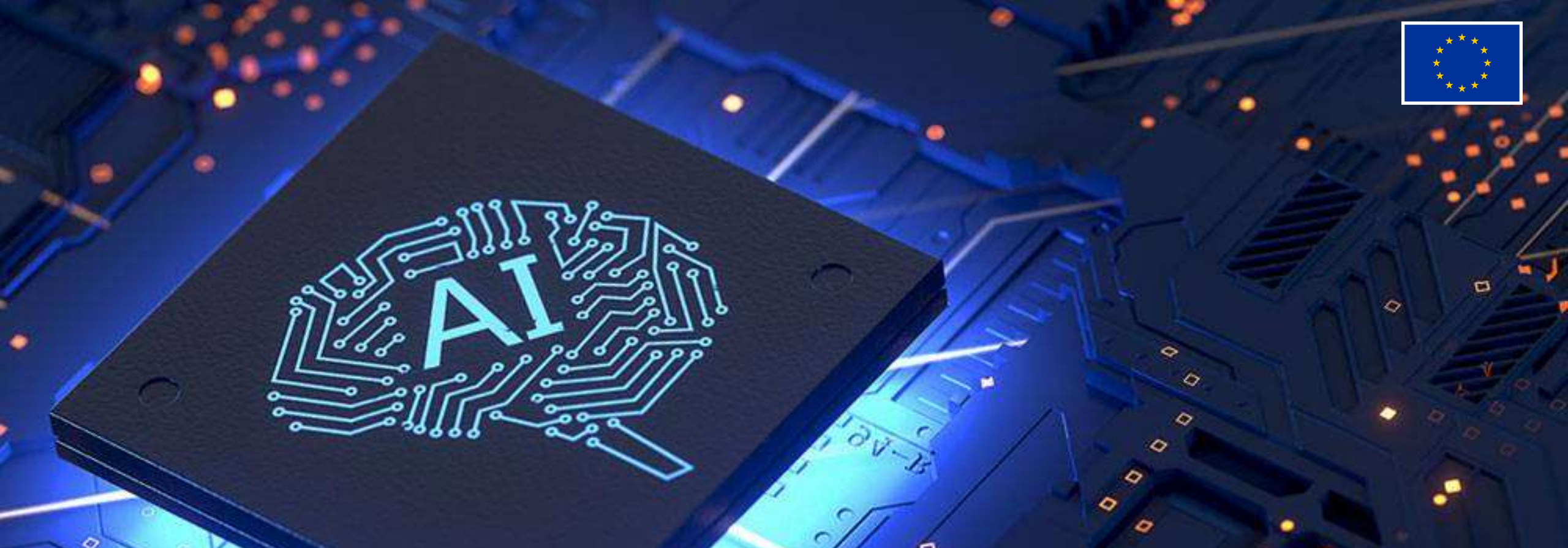
Vulnerable groups such as:

- **Children**
- Persons with **disabilities**
- Historically have a **disadvantaged**
- Are at risk of **exclusion**

## Seven key requirements for Trustworthy AI:

- I. Human agency and oversight
- II. Technical robustness and safety
- III. Privacy and data governance
- IV. Transparency
- V. Diversity
- VI. Non-discrimination and fairness
- VII. Environmental and societal well-being
- VIII. Accountability.

Ensuring Trustworthy AI **is not about ticking boxes**, but about continuously identifying and implementing requirements, evaluating solutions, ensuring improved outcomes throughout the AI system's lifecycle, and involving stakeholders in this.



# AIA CATEGORIZATION



# Forbidden AI practices (AIA, Article 5 )



## Feb 2, 2025 in action, Article 5 summary:

Use AI for **manipulative, exploitative and social practice that contradicts** EU values of respect of human dignity, freedom, equality, democracy and the rule of law and union fundamental rights. Include the right to **nondiscrimination, data protection and privacy** and the **right of the child**.

Nice discussion,...

## USE GAME AI TECHNOLOGY MEDIA & GAME ADDICTION

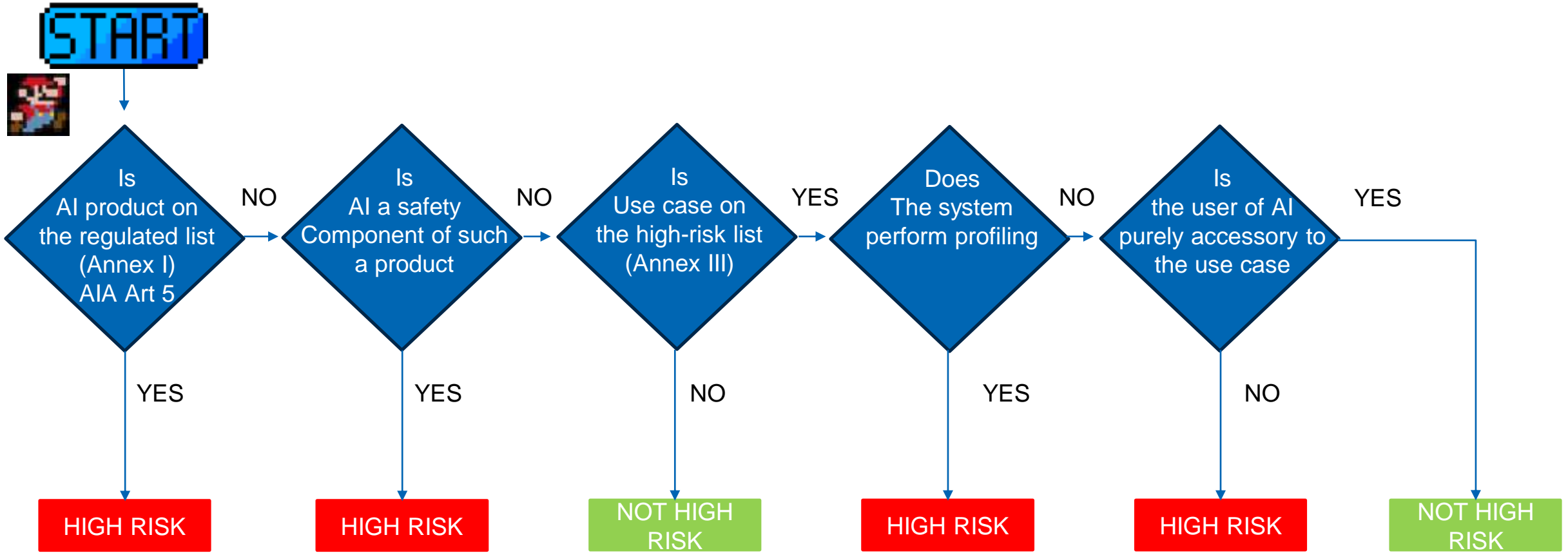


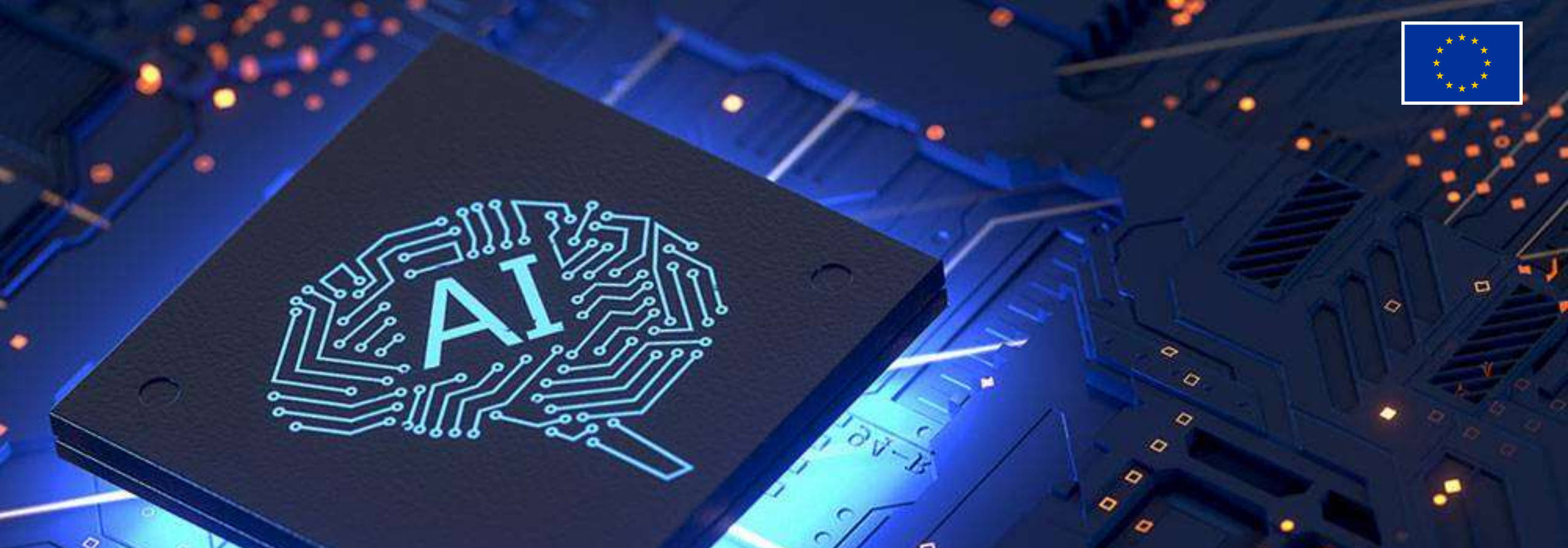
## USE GAME AI TECHNOLOGY FOR MOTIVATION



<b>Prohibited AI</b>	<ul style="list-style-type: none"><li>• Established in the AI Act (Art. 5 AIA)</li><li>• Significant risks to health, safety, or fundamental rights (Art. 6 AIA)</li><li>• Regulated products listed in Annex I</li><li>• High-risk areas in Annex III subject to risk assessment</li></ul>
<b>High Risk</b>	<ul style="list-style-type: none"><li>• Specific transparency-related risks</li><li>• Certain AI systems not classified as high-risk but still subject to specific transparency obligations (Art. 50 AIA)</li></ul>
<b>Transparency Risk ('low risk')</b>	<ul style="list-style-type: none"><li>• Separate rules for general-purpose AI models (Art. 50 AIA et seq.)</li></ul>
<b>General Purpose AI</b>	<ul style="list-style-type: none"><li>• Systemic risk (Art. 55 AIA)</li></ul>
<b>Regulatory Sandbox</b>	<ul style="list-style-type: none"><li>• Encouraging innovation focused on testing and validation (Art. 57 AIA)</li><li>• Under direct supervision</li></ul>

# Simplified AI categorization flow

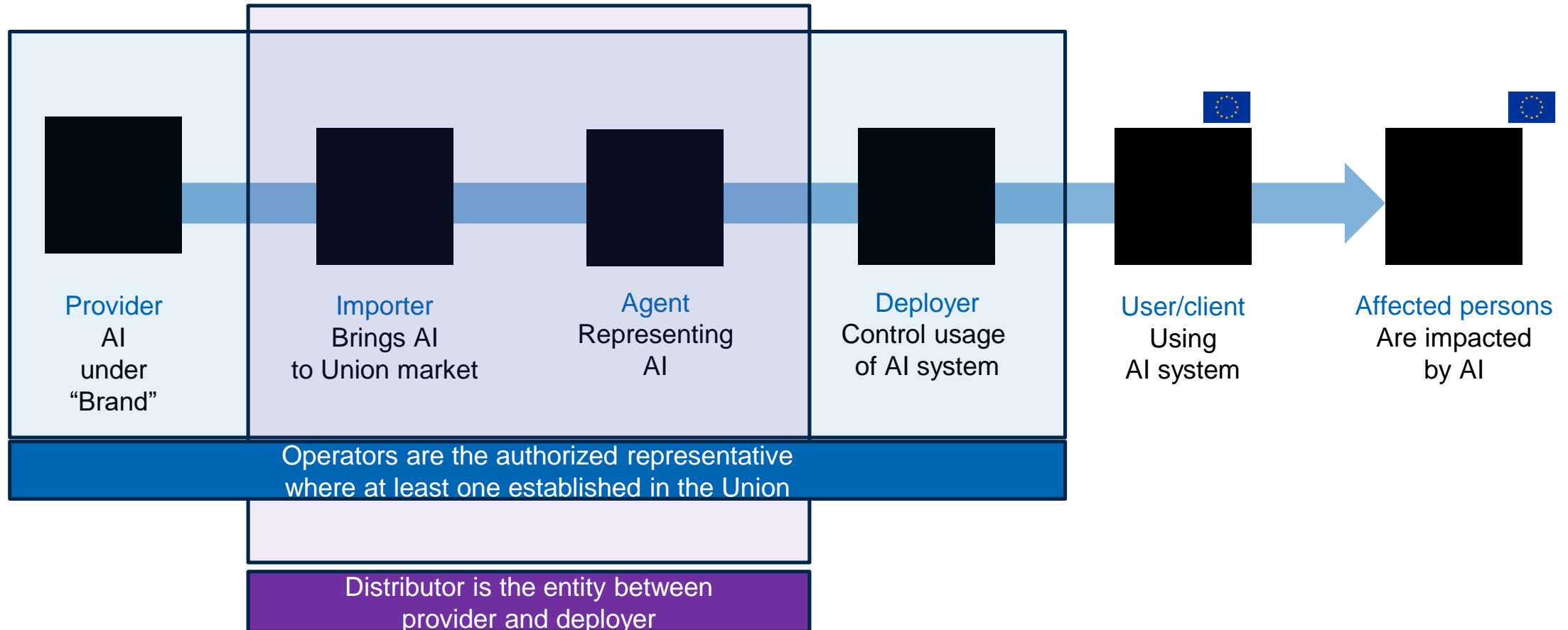




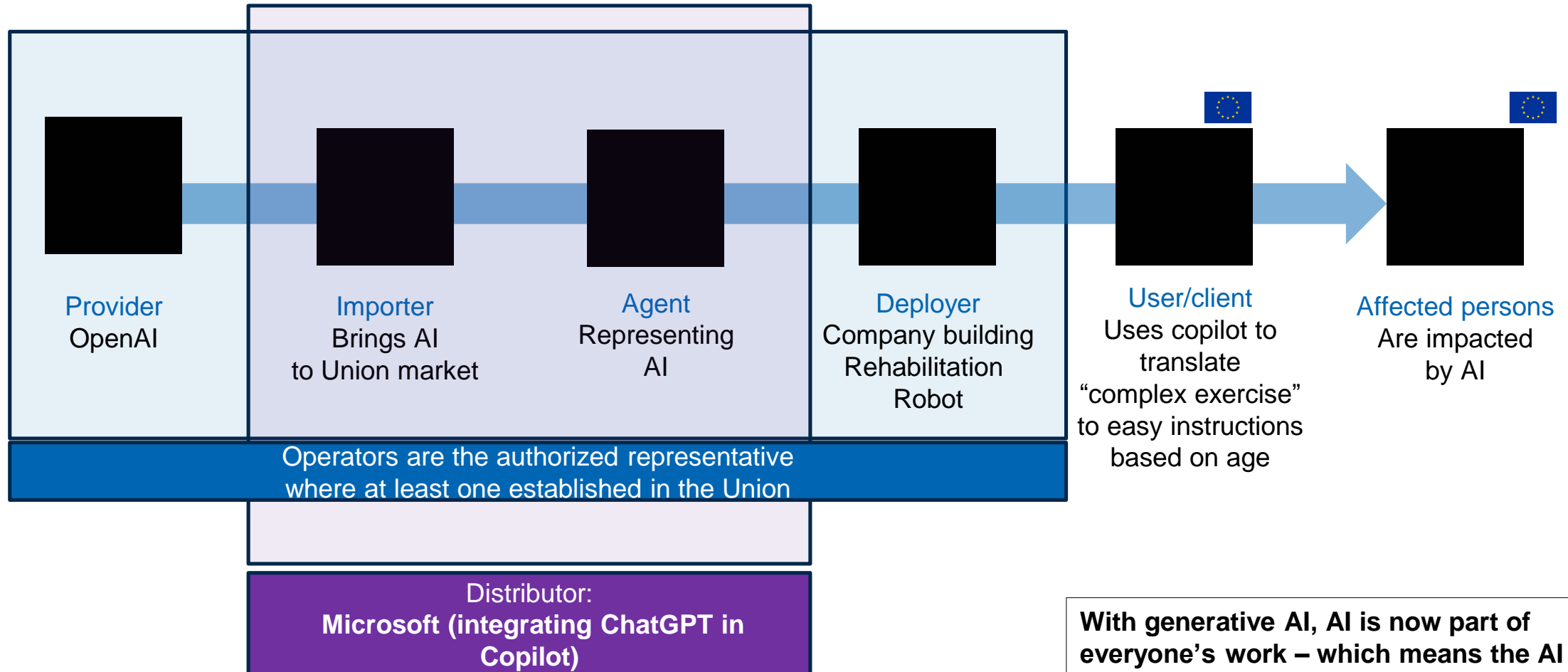
# DOING BUSINESS IN EUROPE



# One presence in the value chain (simplified version of AIA Article 2).



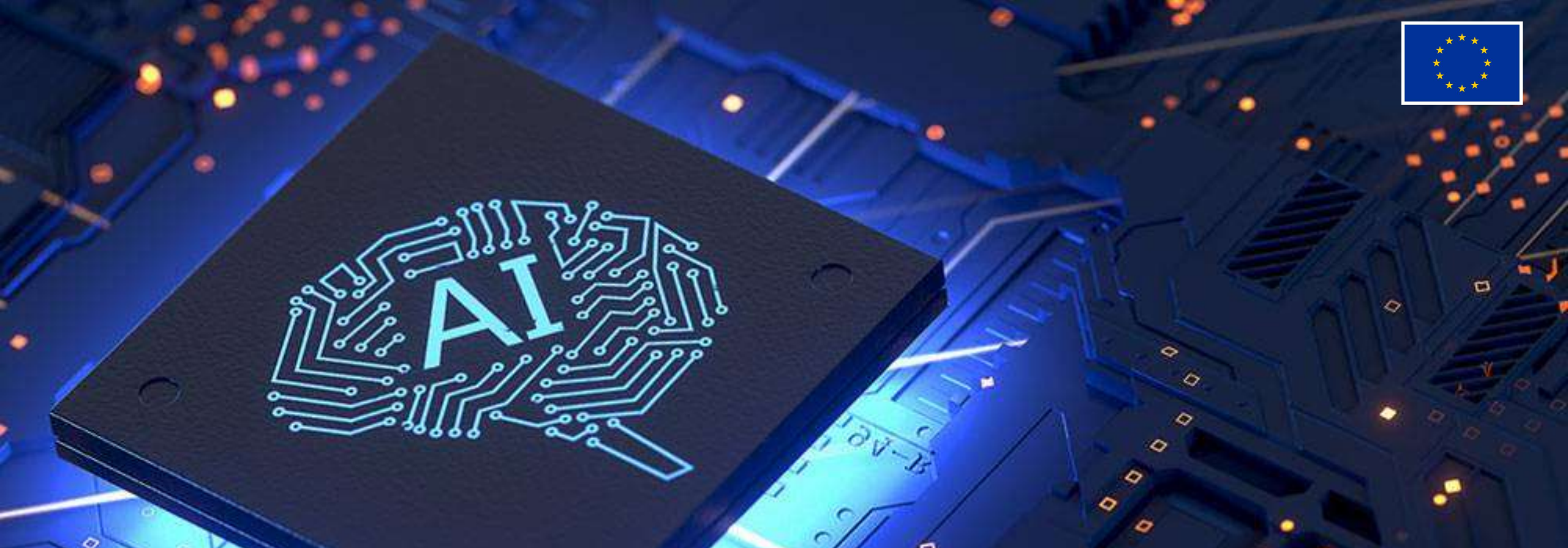
# Example ChatGPT in the chain (simplified version of AIA Article 2).



With generative AI, AI is now part of everyone's work – which means the AI Act affects everyone

# Hack the one presence in the value chain?





## Putting the AI ACT in practice 101



## ACTOR TYPE X RISK CATEGORY = LEGAL OBLIGATIONS

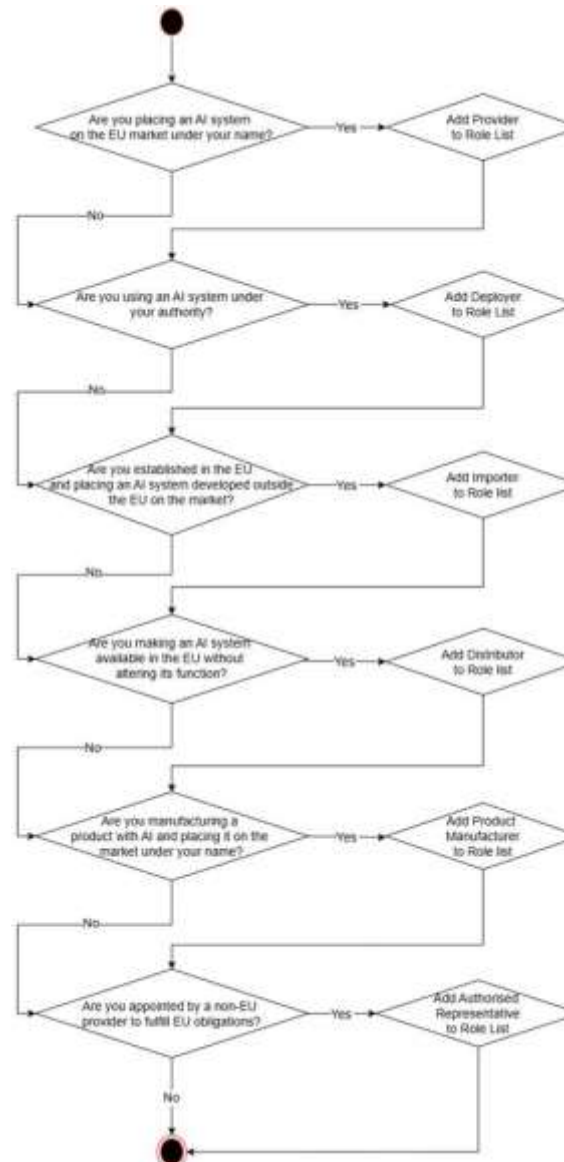
Actor Type	High Risk	Limited Risk
<b>Provider</b>	Lifecycle risk management (Art. 9), data governance (Art. 10), technical documentation (Art. 11), logging capabilities (Art. 12), transparency and instructions (Art. 13), human oversight (Art. 14), robustness, accuracy and cybersecurity (Art. 15), Provider Identification (Art. 16(b)), Quality Management System (Art. 17), Maintain Technical Documentation (Art. 18), Logging Obligations (Art. 19), Corrective Actions & Reporting (Art. 20), Conformity Assessment (Art. 43), EU Declaration of Conformity (Art. 47), CE Marking (Art. 48), Registration in EU Database (Art. 49(1)), Demonstrate Compliance upon Authority Request (Art. 16(k)), Accessibility Compliance (Art. 16(i), Recital 80)	Ensure Users Are Informed When Interacting with AI Systems (Art. 50(1), Recital 132), Mark Synthetic Content as Artificially Generated or Manipulated in Machine-Readable Format (Art. 50(2), Recital 133).
<b>Importer*</b>	Verify Conformity Assessment by Provider (Art. 23(1)(a)), Verify Technical Documentation Exists (Art. 23(1)(b)), Ensure CE Marking, Declaration of Conformity and Instructions Are Present (Art. 23(1)(c)), Verify Appointment of Authorised Representative (Art. 23(1)(d)), Withhold Market Placement if Non-compliant or Falsified (Art. 23(2)), Inform Authorities if System Poses a Risk (Art. 23(2)), Importer Identity and Contact Information (Art. 23(3)), Ensure Storage and Transport Do Not Jeopardise Compliance (Art. 23(4)), Retain Key Documentation for 10 Years (Art. 23(5)), Provide Authorities with Documentation Upon Request (Art. 23(6)), Ensure Technical Documentation Availability (Art. 23(6)), Cooperate with Authorities in Risk Mitigation Actions (Art. 23(7)).	No obligations specified under the EU AI Act
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<b>Product Manufacturer*</b>	Ensure Prevention and Mitigation of Safety Risks from AI Components in Products, including Autonomous Robots and Diagnostic Systems in High-Stakes Contexts like Health and Manufacturing (Recital 47), Ensure Safety of Non-High-Risk AI Systems via General Product Safety Regulation (EU) 2023/988 as a Complementary Safeguard (Recital 166)	No obligations specified under the EU AI Act
<b>Authorized Representative (Agent)</b>	Appointment by Written Mandate (Art. 22(1)), Task Performance as Mandated by Provider (Art. 22(2)), Provide Mandate Copy to Authorities Upon Request (Art. 22(3)), Verify EU Declaration and Technical Documentation (Art. 22(3)(a) Retain Provider Contact Details and Compliance Documentation for 10 Years (Art. 22(3)(b)), Provide Information and Access to Logs to Authorities Upon Request (Art. 22(3)(c)), Cooperate with Authorities in Risk Mitigation (Art. 22(3)(d)), Ensure Registration Compliance or Verify Accuracy if Done by Provider (Art. 22(3)(e)), Accept Regulatory Contact on Provider's Behalf (Art. 22(3), final sentence), Terminate Mandate if Provider Breaches Obligations and Inform Authorities (Art. 22(4)).	No obligations specified under the EU AI Act

Table 2.1. Role-Specific Legal Obligations by Risk Category under the EU AI Act

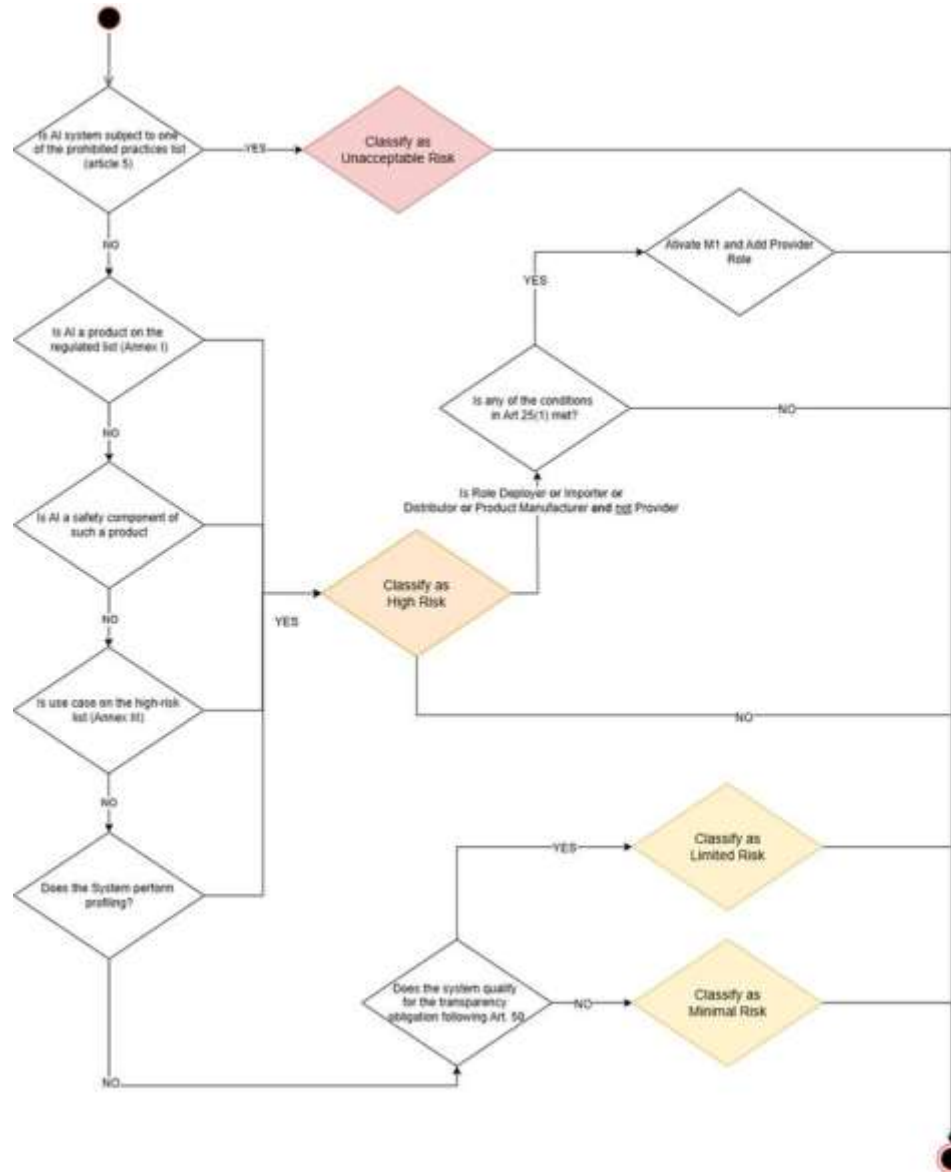
If only....



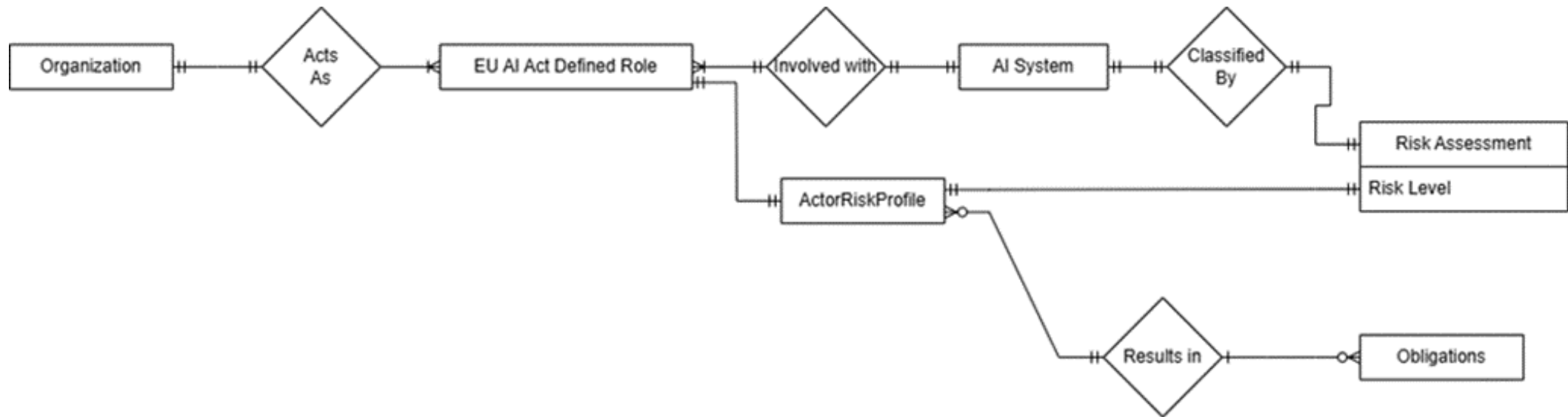
# Finding your Actor Role(s): (M1)



# Finding your Risk Category and role (again...) (M2)



# So actually this is our core control selection..... (M3)



# Circling back to the core controls (M3/M4)

Actor Type	High Risk	Limited Risk
<b>Provider</b>	<p>Lifecycle risk management (Art. 9), data governance (Art. 10), technical documentation (Art. 11), logging capabilities (Art. 12), transparency and instructions (Art. 13), human oversight (Art. 14), robustness, accuracy and cybersecurity (Art. 15), Provider Identification (Art. 16(b)), Quality Management System (Art. 17), Maintain Technical Documentation (Art. 18), Logging Obligations (Art. 19), Corrective Actions &amp; Reporting (Art. 20), Conformity Assessment (Art. 43), EU Declaration of Conformity (Art. 47), CE Marking (Art. 48), Registration in EU Database (Art. 49(1)), Demonstrate Compliance upon Authority Request (Art. 16(k)), Accessibility Compliance (Art. 16(i), Recital 80)</p>	<p>Ensure Users Are Informed When Interacting with AI Systems (Art. 50(1), Recital 132), Mark Synthetic Content as Artificially Generated or Manipulated in Machine-Readable Format (Art. 50(2), Recital 133).</p>
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## Exercise (Goal find your EU AI ACT obligations)

Select one of the following AI use cases (from easy to hard):

- On-device Pose-Check for Home Rehabilitation
- Importing/using a Personalised Motivation Engine from an US based company in your game
- Using ChatGPT to match an Indian resume to a new remote game developer job opening in Netherlands
- Employing a Adaptive Rehab Coach with Outcome Prediction in your rehabilitation robot

Take your selected use case and find your obligations under the EU AI ACT using :

- M1 Actor Role Classifier
- M2 Risk Tier Mapper
- Actor Type x Risk level Table

## ACHIEVE COMPLIANCE WITH EU AI ACT?

ACCEPT



DECLINE



administrative fines of up to €35 million or 7% of global annual turnover (Art. 99)

# We need to translate our obligations into actions (M4)



# Document and create the evidence trail for audit (M5)



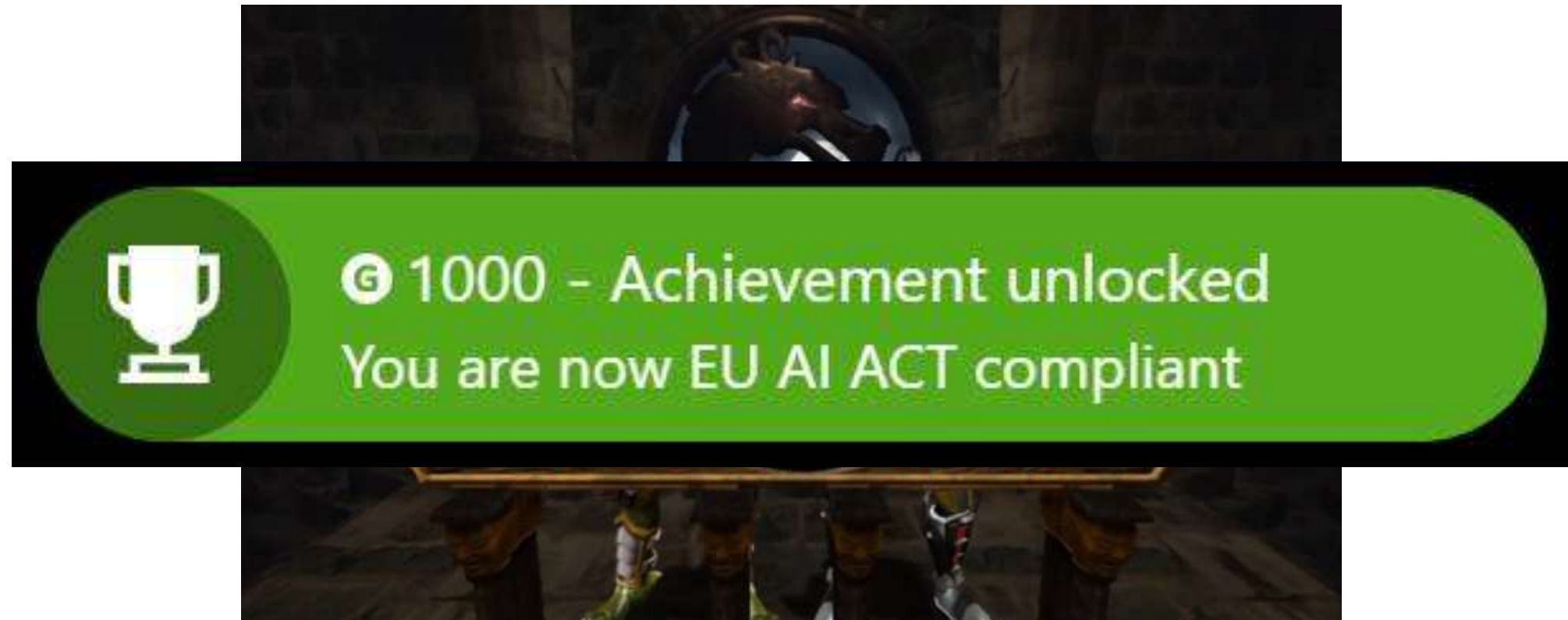
everything...



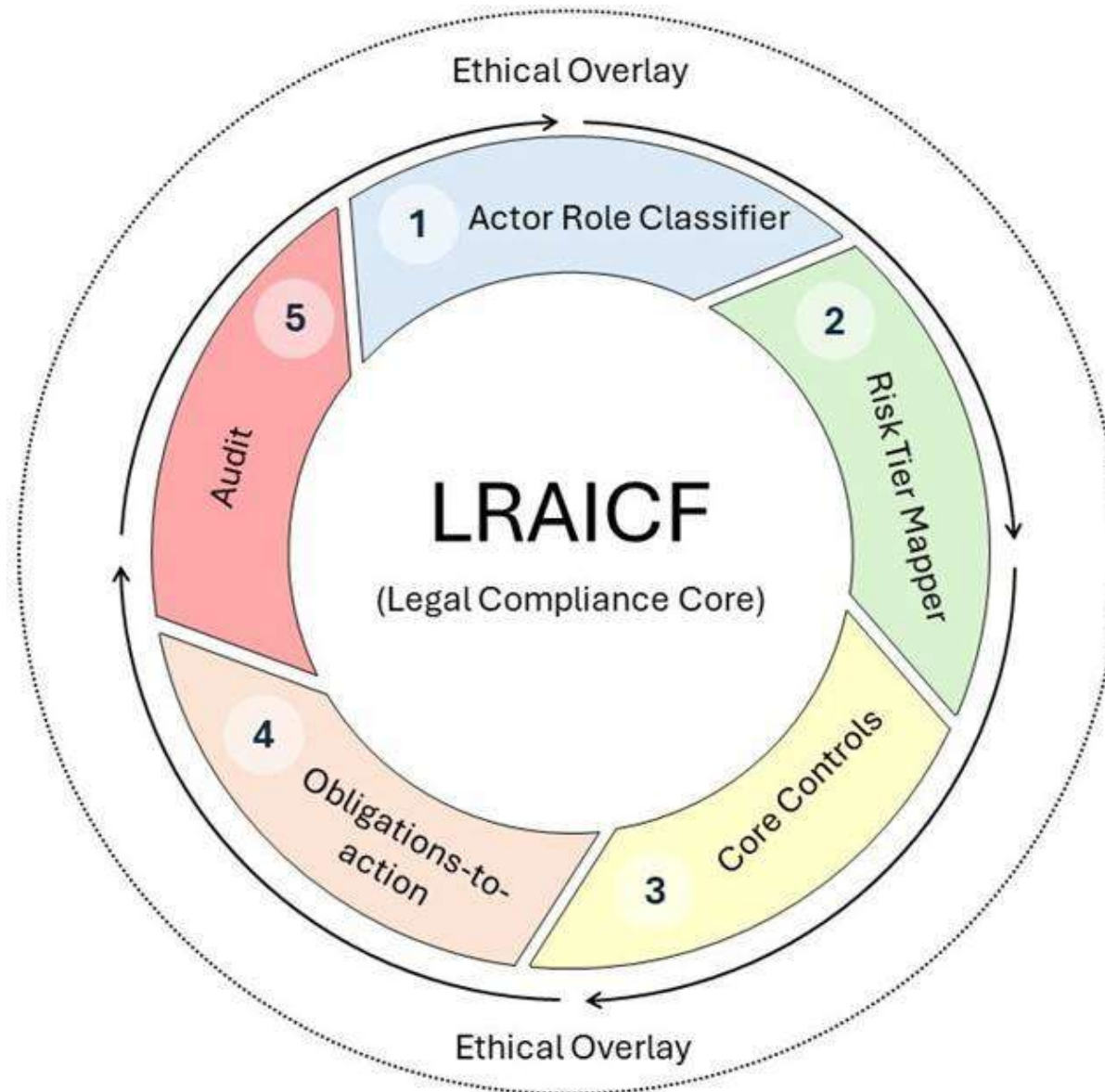
We need to document

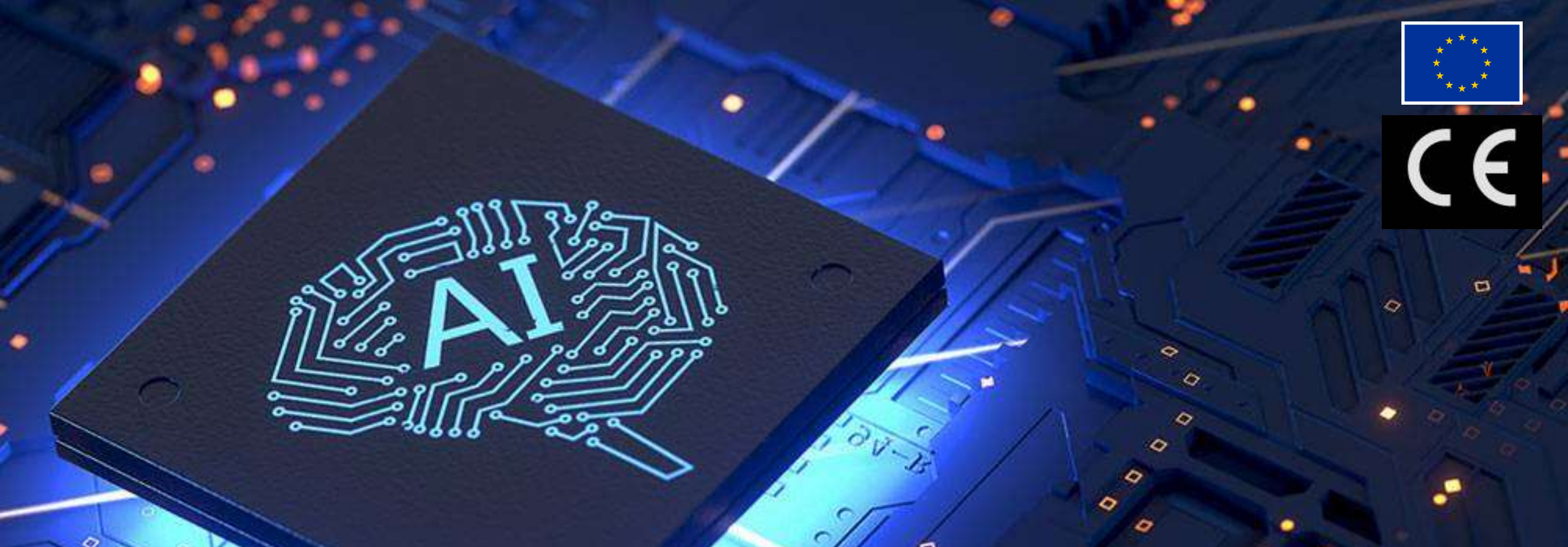


## The final step... the dreaded Audit



# Complete Compliance Circle, the LRAICF framework





# KNOWN EU CERTIFICATIONS

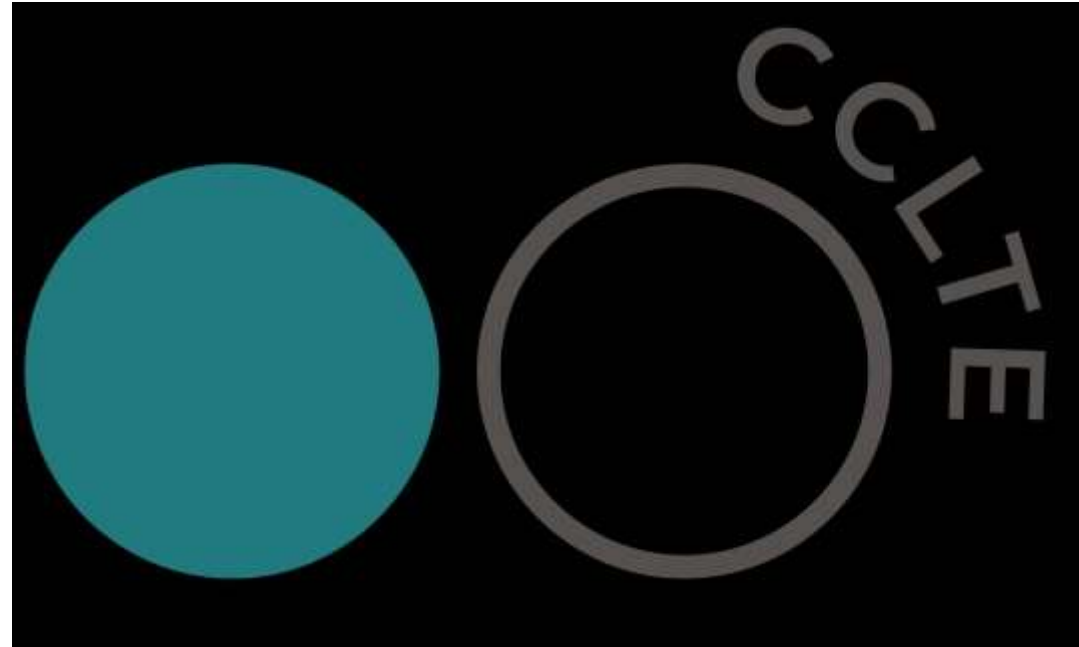


# AI marketed in the EU ?



**2026:** CE Marking is mandatory for “high-risk” AI systems

**2027:** CE Marking is mandatory for all AI systems



Human certification  
Certified AI Compliance Officer [CAICO]



## Human certification

Certified Responsible AI Developer [CRAID]

Certified AI Business Leader [CAIBL]

Ethical AI Education Professional Certification [EAIEC]

## Organisational certification

European AI Act Compliant Provider Certification [EU-AIA CPC]

49 European AI Act Compliant Deployer Certification [EU-AIA CDC]



**Micha van der Meer BEd, MSc, CAICO**  
[micha.vandermeer@inholland.nl](mailto:micha.vandermeer@inholland.nl)  
[www.inholland.nl](http://www.inholland.nl)

# Questions



**Wiley Finch MSc, CISSP, CAICO**  
[wiley.finch@inholland.nl](mailto:wiley.finch@inholland.nl)  
[www.inholland.nl](http://www.inholland.nl)