

EN

E-003010/2026

Answer given by Executive Vice-President Virkkunen
on behalf of the European Commission
(17.9.2026)

Article 3(1) of the AI Act¹ defines an AI system in a manner aligned with the approach of the Organisation for Economic Co-operation and Development. Recital 12 of the AI Act clarifies that techniques that enable inference while building an AI system include machine learning (ML) approaches that learn from data how to achieve certain objectives.

Systems based on linear or logistic regression use ML techniques. Their parameters are learned from their training data. The Commission considers these systems to fall outside the definition of an AI system where they meet the narrow conditions outlined in points 42 to 45 of the Guidelines on the AI system definition². If such systems permit adjustments of their decision-making models in an intelligent way, they fall within that definition.

For the financial sector, the AI Act classifies as high-risk AI systems that fall within the two use cases listed in point 5(b) and (c) of Annex III of the AI Act³. Such systems are subject to requirements under the AI Act regarding, *inter alia*, their design and use to mitigate potential risks to fundamental rights⁴. Nevertheless, no high-risk AI system placed on the market⁵ before 2 December 2027 will be subject to these requirements unless its design is significantly changed after this date.

The Commission's public consultation⁶ on the draft guidelines on the classification of high-risk AI systems included specific questions on the need to remove, adapt or add high-risk use cases to the list in Annex III of the AI Act. Findings will be published in a report pursuant to Article 112(1) of the AI Act.

The Commission is working towards a simplified and proportionate approach for the application of the AI Act's requirements to high-risk AI systems based on linear or logistic regression used in the financial sector that properly reflects those systems' transparent and explainable nature.

¹ Regulation (EU) 2024/1689.

² C(2025) 5053 final.

³ That classification has been done even if the use cases in practice largely relied on systems based on linear or logistic regression given their dependency on data and risks of biases.

⁴ In particular the right to non-discrimination, especially when trained on biased data sets.

⁵ The same applies to high-risk AI systems put into service before 2 December 2027.

⁶ <https://digital-strategy.ec.europa.eu/en/consultations/targeted-consultation-draft-guidelines-classification-high-risk-artificial-intelligence-systems>.