Template for marketing and communications · As of November 2026

AI policy for marketing and *communications.*

A model template with which you clearly define which AI tools your team uses, which data may go into them, who approves content and when you label AI use. That way you use the pace of AI without putting brand, data protection and trust at risk.

Policy areas	Data traffic light	Introduction
8	**3**	**30 days**
from tools and data to labeling and incidents	levels that everyone on the team can apply without asking	from draft to signed acknowledgment

The template regulates

- Which AI tools are approved
- Which data may go into which tools
- What AI is used for and what not
- How content is reviewed and approved
- When and how you label AI use
- What applies to copyright and personality rights
- Who is responsible for what
- What happens in case of errors and incidents

Not legal advice: this template is not legal advice and does not replace a review of the individual case. It is intended as guidance. Please agree your finished policy with your legal department, your data protection officer and, if applicable, the works council.

Contents

Clear rules, *faster work.*

Chapter 1 sets out the framework. Chapters 2 to 9 contain the building blocks of the policy, each with sample text. Templates to fill in follow from page 14.

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How to use the template: you can adopt the sample texts in the boxes directly. Replace placeholders in square brackets such as `[company]` or `[responsible person]` with your details. Delete what does not suit you instead of overloading the policy with special cases.

Chapter 01

Why an AI policy, *and which framework applies.*

In most marketing teams, AI has long been in use, often with private accounts and without shared rules. A policy creates clarity: the team knows what is permitted, and management knows that risks are under control.

01 Pace

Whoever knows what is permitted does not have to ask every time. Clear rules speed up work.

02 Protection

Confidential data, customer data and trade secrets stay where they belong.

03 Trust

Reviewed content and honest labeling protect brand and credibility.

The legal framework at a glance

REGULATION	WHAT IS RELEVANT FOR MARKETING AND COMMUNICATIONS
EU AI Act, Art. 4	Since 2 February 2025, companies that use AI systems must ensure sufficient AI literacy among their employees.
EU AI Act, Art. 50	Since 2 August 2026, transparency obligations apply, for example for deepfakes, chatbots and certain AI texts on topics of public interest.
GDPR	Personal data may only go into AI tools with a legal basis and, as a rule, only with a data processing agreement.
Copyright	Purely AI-generated content is generally not protected by copyright in Germany. Third-party rights must still be respected.
Trade secrets	Whoever enters confidential information unprotected into external tools can jeopardize its protection.
Competition law	Advertising claims must be true and verifiable, even if an AI phrased them.

Status and limits: the overview reflects the status as of November 2026 in simplified form. Rules and their interpretation continue to evolve. It does not replace legal advice and serves as guidance.

Chapter 02 · Building block

Scope *and principles.*

Sample text: scope

This policy applies to all employees, freelancers and agencies who create, edit or publish content in marketing and communications for [company]. It covers texts, images, videos, audio, presentations and translations, internal and external, and all AI tools, regardless of whether they are standalone or built into other software.

Six principles

01 People are accountable

AI supports but does not decide. A person is responsible for every published piece of content.

02 Approved tools only

For work content, we exclusively use tools from the tool register, no private accounts.

03 Data by traffic light

The data traffic light defines which data may go into which tool.

04 Check before publishing

We check facts, figures, quotes and sources before content goes out.

05 Label honestly

Where required by law or where the audience could be misled, we make AI use transparent.

06 Preserve the brand voice

AI content must match our brand voice and values, not the other way round.

Tip: keep the principles so short that they fit on one page. The details are in the following building blocks. You will find a short version to post on page 15.

Chapter 03 · Building block

Approved tools *and tool approval.*

A central tool register prevents uncontrolled growth. It shows at a glance which tool may be used for what and with which data.

Sample text

```
For work content, only AI tools listed in the tool register may be used. Use takes place via company accounts. You request new tools from [responsible person]. They are reviewed together with IT and data protection before use.
```

Review criteria for new tools

CRITERION	WHAT TO LOOK FOR
Data usage	Are entered contents used to train the model? Can this be switched off?
Contract	Is there a data processing agreement under Art. 28 GDPR and clear terms of use?
Storage location	Where is data processed and stored, inside or outside the EU?
Access and rights	Are there company accounts, roles, single sign-on and a deletion function?
Rights to results	What do the terms say about usage rights to generated content?
Traceability	Can inputs and results be traced, for example for approvals?

Approval levels in the tool register

Approved
Use for the approved purposes and data levels without further inquiry.

Restricted
Use only for certain purposes, for example only with public data.

Not approved
No use for work content, not even for testing.

Chapter 04 · Building block

The *data traffic light.*

The most important rule of the policy. It must be so simple that everyone on the team can apply it without asking.

LEVEL	EXAMPLES	RULE
Green public	Published website texts, press releases, general specialist knowledge, public studies	Permitted in all approved tools
Yellow internal	Internal drafts, campaign plans, brand guidelines, anonymized evaluations, briefings without personal data	Only in tools with a company account, contract and training switched off
Red confidential	Customer and personnel data, contact lists, unpublished figures, contracts, prices, product news before announcement, access credentials	Not in AI tools, except in internal systems explicitly approved for this

Sample text

```
Before every input into an AI tool, you check the data level. You do not enter red data. Yellow data only goes into tools approved for the yellow level in the tool register. When in doubt, treat data as the higher level or ask [responsible person].
```

Three questions before every input

01 **Could this content be public tomorrow?** If yes: green.

02 **Does it contain names, contact details or other information about people?** If yes: red, or anonymize first.

03 **Would it harm us if a competitor knew it?** If yes: at least yellow, rather red.

Everyday examples

Outline a blog article from public sources	Green
Revise the campaign plan for the next quarter	Yellow
Upload the newsletter mailing list for an evaluation	Red
Polish quotes from a customer interview with names	Red, anonymized Yellow

Practical tip: anonymizing often opens the way from red to yellow. Replace names, companies and figures with placeholders before you put a text into a tool for revision.

Chapter 05 · Building block

Areas of use: *permitted, with approval, excluded.*

A list of typical areas of use makes the policy tangible. Adapt it to your channels and your risk profile.

Permitted

- Ideas, outlines and topic suggestions
- Research as a starting point, with source checks
- First drafts for blog, newsletter and social media
- Variants for headlines and teasers
- Shortening, rephrasing, proofreading
- Summaries of public sources

With approval

- Press releases and statements
- Translations for publication
- AI-generated images and videos
- Chatbots and automated replies to customers
- Content with advertising claims on environment, health or prices
- New tools and automations

Excluded

- Deceptively real depictions of real people without consent
- Invented quotes, customer voices or reviews
- Crisis content without coordination with communications management
- Publication without human review
- Imitation of protected works or brands

Sample text

```
AI may be used without separate approval for the tasks marked as permitted. Tasks requiring approval
are agreed with [approver] before implementation. Excluded tasks are not permitted, not even as a test.
```

Why reviews and quotes are excluded: invented customer voices or statements mislead the audience and can have consequences under competition law. You obtain genuine voices through customer interviews; AI may polish them linguistically afterwards but not change their content.

Chapter 06 · Building block

Quality assurance *and approval.*

AI systems phrase things convincingly, even when content is wrong. That is why every AI-supported piece of content needs human review, graded by risk.

CONTENT TYPE	REVIEW	APPROVAL BY
Internal content	Self-check by the creator	Creator
Standard external content	Facts, sources, brand voice, second pair of eyes	Team lead or editorial team
Sensitive content	Additionally the business unit, legal if needed	Head of communications

Eight checkpoints before publication

- ☐ Facts and figures checked against original sources
- ☐ Sources exist and are cited correctly
- ☐ No invented quotes or examples
- ☐ Advertising claims can be substantiated
- ☐ Brand voice and form of address are right
- ☐ No confidential data included
- ☐ No third-party rights infringed
- ☐ Labeling checked where necessary

Sample text

```
No AI-supported content is published without human review. The creator checks the content against the checkpoints and documents which tools they used. Approval follows the approval level of the content type.
```

Further reading: who takes on which role in creation, review and approval is best defined in a RACI matrix. You will find a template for this in the resources on dennis-gumprich.de/en/resources.

Chapter 07 · Building block

Labeling of *AI content.*

Not every AI-supported piece of content needs to be labeled. What matters is the type of content and whether the audience could be misled.

CASE	GUIDANCE UNDER ART. 50 AI ACT
Deepfakes	Images, audio or videos that depict real people, places or events in a deceptively real way must be disclosed. Lighter obligations apply to evidently artistic or satirical works.
Chatbots	People must be able to recognize that they are talking to an AI system, unless this is obvious.
Texts on topics of public interest	AI-generated texts intended to inform the public must be disclosed. This does not apply if a person has reviewed them editorially and someone bears editorial responsibility.
Usual marketing texts	For texts reviewed and taken responsibility for by people, there is generally no labeling obligation under the AI Act. You can be transparent voluntarily.

Sample text

```
We visibly label AI-generated or heavily altered images, videos and audio content that depict real people, places or events. Chatbots identify themselves as AI. For texts, the approving person decides whether labeling is required or useful. Internally, we document AI use for all published content.
```

Wording examples

Image

“Image created with AI”

Text

“Created using AI, editorially reviewed by [name]”

Chatbot

“You are writing with our AI assistant”

Note: the classification is simplified and does not replace legal advice. Also check the requirements of the platforms on which you publish, as many require their own labels for AI content.

Chapter 08 · Building block

Copyright, trademark and *personality rights.*

AI generates content at the push of a button. The rights to it and the rights of others must still be respected.

01 Protecting your own content

Purely AI-generated content is generally not protected by copyright in Germany because there is no personal intellectual creation. Whoever wants to protect key content ensures recognizable human design.

02 Third-party works in the prompt

Do not put third-party texts, images or studies into tools in full to have them rewritten. Use quotes only within the permitted scope and with a source.

03 Style and brands

Do not request content “in the style of” well-known artists, brands or campaigns. Check results for similarity to logos and protected characters.

04 People, faces, voices

Depictions of real people, including employees, only with their consent. This applies especially to synthetic voices and videos.

Sample text

```
AI tools may not be used to imitate protected works, brands or people. We only create depictions of real people with their written consent. If in doubt about whether content is permissible, contact [legal department or external advisor] before publication.
```

Agencies and freelancers

- **Regulate contractually:** whether and how service providers may use AI and which data levels apply.
- **Require disclosure:** which tools were used for your content.
- **Clarify rights:** who grants usage rights to the delivered content and to what extent.

Chapter 09 · Building block

Roles, AI literacy *and incidents.*

ROLE	TASKS
Owner of the policy	Maintains the policy and tool register, answers questions, organizes training
Team leads	Ensure compliance in the team and approve content
Employees	Use AI according to the rules, check results, report incidents
IT and data protection	Check new tools, contracts and data flows
Legal department or advisors	Advise on labeling, rights and advertising claims in individual cases

Building AI literacy

Since February 2025, Art. 4 AI Act requires employees who use AI to have sufficient AI literacy. No fixed form is prescribed. The following have proven effective:

- **Introductory training** on the policy for everyone who uses AI, with documented attendance.
- **Practical formats** such as prompt office hours or shared examples from everyday work.
- **Refresher** once a year and for new tools.

Sample text: incidents

```
Anyone who finds that confidential data has entered a non-approved tool or that faulty AI content has been published reports this without delay to [responsible person] and, for personal data, to data protection. The goal is quick damage limitation, not looking for someone to blame.
```

Review: stipulate that the policy is reviewed at least once a year and whenever there are significant legal or technical changes. Record date and version in the document.

Chapter 10

Introduction in *30 days.*

A policy only works when the team knows it and applies it. Four weeks are enough to get from draft to a rule that is lived.

Week 1

Inventory

- Ask which tools the team uses today
- Collect typical areas of use
- Name a responsible person

Week 2

Draft

- Adapt the building blocks of this template
- Fill in the tool register and data traffic light
- Define approval levels

Week 3

Coordination

- Check with legal, data protection and IT
- Involve the works council, if there is one
- Management approves the policy

Week 4

Introduction

- Training for everyone who uses AI
- Have the acknowledgment signed
- Post the short version visibly

Result after 30 days

Policy	Approved, with version and date, accessible to everyone.
Tool register	All tools used with status, purpose and data level.
Training	Attendance documented as proof of AI literacy.
Acknowledgment	Signed by everyone involved, including agencies.

Embed instead of file away: rules work best where the work happens. Store the data traffic light and checkpoints directly in briefings, templates and approval steps of your content processes.

Chapter 11

Pitfalls *and self-check.*

Six mistakes in AI policies

01 Prohibiting instead of regulating

Blanket bans lead to shadow AI with private accounts. Better: provide secure tools.

02 Too long and too legalistic

A policy that nobody reads protects nobody. The short version must fit on one page.

03 No data rule

Without a clear data traffic light, everyone decides for themselves what may go into a tool.

04 Forgetting agencies

External parties often create a large share of the content. The rules must apply to them too.

05 Write once, never review

Tools and rules change quickly. Without a fixed review date, the policy becomes outdated.

06 No contact person

Without a responsible person, questions remain unanswered and the team improvises.

Self-check: how well is your AI use regulated?

	STATEMENT
☐	We have a tool register, and the team only uses company accounts.
☐	Everyone knows the data traffic light and applies it.
☐	AI content is reviewed against fixed checkpoints before publication.
☐	We know when to label AI content.
☐	Attendance at AI literacy training is documented.
☐	The policy also applies to agencies and is reviewed annually.

Evaluation: up to two ticks: start with week 1 of the introduction. Three to four ticks: the foundation is in place; close the gaps in a targeted way. Five to six ticks: your framework holds; now embed it firmly in your content processes.

Template A

Tool register

As of: _____ · Responsible: _____

TOOL	PURPOSE	STATUS	DATA LEVEL	CONTRACT	TRAINING OFF	CHECKED ON
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	
		A / R / N	G / Y / R	y / n	y / n	

Status: A approved, R restricted, N not approved. Data level: highest permitted level, G green, Y yellow, R red.

Template B

Our AI rules on one page

[Company] · Marketing and communications · Version _____ of _____

01	**People are accountable:** a person is responsible for every published piece of content.
02	**Approved tools only** from the tool register, only with a company account.
03	**Data traffic light:** green everywhere, yellow only in approved tools, red never.
04	**Check before publishing:** facts, sources, quotes, advertising claims, brand voice.
05	**Label honestly:** deceptively real images, videos, voices and chatbots always.
06	**No invented** quotes, customer voices or reviews.
07	**Respect rights:** no imitation of works, brands or real people.
08	**Report incidents immediately** to [responsible person].

Acknowledgment

I have read and understood the AI policy and comply with the rules set out in it.

NAME	TEAM OR AGENCY	DATE	SIGNATURE

This template is not legal advice but guidance. Please have it legally reviewed before use.

Next steps

From template *to a rule that is lived.*

01 **This week:** take stock of the tools in use and name a responsible person.

02 **Next week:** adapt the building blocks, fill in the tool register and data traffic light.

03 **In 30 days:** approve the policy, train the team, collect acknowledgments.

Free analysis

Where does your content process lose *time today?*

In 30 minutes, we look together at where unnecessary coordination, manual tasks, tool switching or recurring content work cost you time today, and how you embed rules for AI directly in briefing, creation and approval.

Analyze your content process in 30 minutes

dennis-gumprich.de/en/analysis

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Sources

Regulation (EU) 2024/1689 (AI Act), in particular Art. 4 and Art. 50, as amended by the Digital Omnibus 2026. General Data Protection Regulation (EU) 2016/679, in particular Art. 28. German Copyright Act, Section 2 (2). German Trade Secrets Act. German Act against Unfair Competition.

DG

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Transparency note: Dennis works for contentbird, a provider of AI-supported content software. This template is vendor-neutral. It was created using AI, reviewed for accuracy and is the responsibility of Dennis Gumprich. As of: November 2026.