

News

IMDA introduces new "Chatbot Info Card" for generative AI chatbots

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At the inaugural Singapore Data Festival on 20 July 2026, Singapore's IMDA introduced the Transparency Guidelines for Generative AI Chatbots (Guidelines)¹. The voluntary Guidelines encourage organisations deploying generative AI (Gen AI) chatbots to provide users with clear and accessible information through a standardised "Chatbot Info Card".

The Guidelines focus on the application layer, where users interact directly with AI systems. IMDA has chosen to prioritise chatbots given their widespread adoption across industries and increasing concerns around reliability, accuracy and user trust. Rather than prescribing technical requirements for AI models, the Guidelines seek to improve transparency around how chatbot services operate in practice and what users can reasonably expect when using them. We explain the key takeaways below.

Which chatbots are covered?

The Guidelines apply to external-facing Gen AI chatbots that interact directly with customers, consumers or members of the public. They do not apply to AI tools used solely within an organisation, such as internal productivity tools or knowledge assistants.

The level of transparency expected will depend on the chatbot's use case and risk profile. Relevant considerations include:

- the functions performed by the chatbot;
- the industry or sector in which it is deployed (for example, healthcare or financial services);
- the intended users, including whether minors may access the service; and
- whether the chatbot simply provides information or is capable of taking actions on a user's behalf.

Responsibility for providing transparency rests primarily with the organisation deploying the chatbot. However, IMDA recognises that deployers may need information from model developers and other upstream providers to meet those expectations in practice.

A "medicine label" for AI chatbots

A central feature of the Guidelines is the Chatbot Info Card, which IMDA likens to a medicine label. The objective is straightforward: users should not have to piece together information from privacy notices, terms of use and technical documentation to understand how a chatbot operates. Instead, key information should be consolidated into a single, readily accessible source.

The Guidelines do not prescribe a particular format. A Chatbot Info Card may take the form of a dedicated webpage, a disclosure document or an in-product notice. The focus is on ensuring that the information is accessible, relevant and kept up to date.

The Chatbot Info Card

The Guidelines do not require organisations to provide lengthy technical explanations about model architecture or training methodologies. Rather, users should receive information that helps them make informed decisions about using a chatbot.

The Chatbot Info Card should therefore address:

- the chatbot's intended purpose, capabilities and limitations;
- measures adopted to promote safety, reliability and responsible use;
- how personal data is collected, used and protected; and
- channels through which users can submit feedback, raise concerns or seek assistance.

Importantly, the Guidelines do not require disclosure of proprietary information, trade secrets or sensitive security measures. The focus is on providing practical and proportionate information based on what is reasonably available to the organisation.

Making information easy to find

The Guidelines emphasise that transparency is not simply about what information is disclosed, but also how it is presented.

To make information more useful to users, organisations should:

- use plain, non-technical language;
- structure information through headings, summaries and visual aids where appropriate; and
- ensure that information remains easy to locate both when users first engage with the chatbot and throughout the user journey.

The emphasis is on practical usability. Information that is technically available but difficult to find or understand is unlikely to achieve the Guidelines' intended transparency outcomes.

Keeping information up to date

The Guidelines emphasise that transparency should be an ongoing process rather than a one-time disclosure. Organisations are encouraged to make the Chatbot Info Card available when a chatbot is first deployed to external users, including as part of beta testing or pilot programmes, and to keep the information under review as the chatbot develops.

Importantly, IMDA does not expect updates for every change. Instead, organisations should focus on changes that materially affect the chatbot's capabilities, functionality, safety or reliability, and which may therefore alter users' understanding of the service. Routine maintenance and minor interface changes would generally not require an update.

Implications for international businesses

A strongly encouraged minimum standard

Although the Guidelines are voluntary, they are intended to establish a baseline level of transparency for customer-facing Gen AI chatbots and provide a useful indication of IMDA's expectations for deployers.

IMDA strongly encourages organisations to adopt a minimum standard of disclosure. At a minimum, deployers are encouraged to address each of the four categories of information identified in the Guidelines, with at least one substantive disclosure under each category. They are also encouraged to provide a high-level safety statement at first use, together with a clear and identifiable link to the Chatbot Info Card.

Accessibility is key

Many organisations will already have much of the relevant information available through privacy notices, AI governance statements or responsible AI policies. What the Guidelines add is a stronger emphasis on accessibility. Information should be presented in a way that is meaningful and easy for users to find, rather than dispersed across multiple policies or technical documents. Users should also be able to access the Chatbot Info Card both at the point of onboarding and during their ongoing interactions with the chatbot.

Next steps

For organisations deploying customer-facing Gen AI tools, a practical next step may be to review existing user-facing disclosures against IMDA's recommended minimum disclosures and consider whether a consolidated Chatbot Info Card could be implemented without significant operational burden. Doing so may not only help align with IMDA's expectations but also strengthen user trust and confidence in AI-enabled services.

If you would like to discuss the Guidelines or their practical implications for your organisation, please reach out to the authors or your usual Hogan Lovells contact.

Authored by Charmian Aw, Ciara O'Leary, Florence Seow, and Hae Jin Lee.

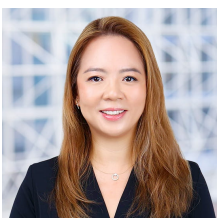
Next steps

Hogan Lovells continues to enhance its legal technology offering through ELTEMATE, its technology company focused on building digital legal solutions, and its participation in the Global Legal Tech Alliance, supporting innovation across its global platform.

References

1 [transparency-guidelines-for-generative-ai-chatbots.pdf](#)

Contacts



Charmian Aw

Partner

 Singapore

 [Email me](#)



Florence Seow

Associate

 Singapore

 [Email me](#)

Ciara O'Leary

Associate

 Singapore

 [Email me](#)