

# ING Leo

answers to these questions

## QUESTION AND TASK

How can AI agents in the ING app be designed to empower young people to make confident financial decisions – while maintaining trust, transparency and data protection?

What role do aspects such as the following play in this context?

- the adaptation of financial knowledge to different needs and life situations,
- combining emotional appeal with factual competence,
- the clear recognisability of AI content to prevent misuse (e.g. fake "finfluencers")?
- and the bank's responsibility as a trusted player in the digital transformation?

Please develop a concept that also includes visual elements.

# adaptation of financial knowledge to different needs and life situations

- financial needs of young users vary strongly: students, „azubis“, young families, teenagers
- Leo should know short- and long-term goals and also risk preferences of each user, e.g. debts, saving goals

Leo's advice must align with personal goals, risk preferences, and short- vs. long-term tradeoffs

Young users benefit most when suggestions are:

- simple to understand
- easy to implement
- clearly linked to their goals
- free from jargon

When advice feels tailored, timely, and genuinely helpful, users perceive the system as respectful and competent

# combining emotional appeal with factual competence

- financial topics often evoke anxiety, insecurity, or confusion – especially for young users encountering them for the first time
- studies confirm that users value empathy in service interactions, and a lack of empathy can drive them away.

Leo's tone should be friendly, non-judgmental, empathetic and motivating

While the tone can be warm, the content must remain:

- accurate
- objective
- free from manipulation
- aligned with the user's best interests

Young users trust a system that feels supportive yet honest. Emotional tone opens the door - credible financial competence keeps them inside.

# The EU AI Act prohibits systems that manipulate consumers into harmful financial decisions.

This means:

- no pressure tactics
- no disguised sales pushes
- no emotional manipulation to upsell loans, credit cards, or premium accounts

this is relevant for our bonus system

clear recognisability of AI content to prevent misuse (e.g. fake “finfluencers”)

One of the fastest-growing risks is AI-generated financial misinformation, including:

- fake financial advisors
- AI-generated “experts” on social media
- deepfake endorsements
- deceptive investment recommendations

To protect users, the EU AI Act requires explicit labeling of AI-generated content

Leo must always be clearly labeled as AI



the bank's responsibility as a trusted player in the digital transformation

The most important factor is ING itself. AI agents are not standalone tools — they are extensions of the bank's values, culture, and ethics

Key responsibilities include:

- human oversight (human review of critical decisions, option to talk to real service employees)
- privacy-by-design (minimal data collection, strong access controls, user control over analyzed data)
- transparency and explainability (no hidden motives, upselling, ...)
- ethical neutrality (Leo must not misuse vulnerable moments, steer users into debt, favor certain products for profit)

Young users want technology that respects their agency and treats them fairly. A responsible bank that builds clear guardrails around AI earns long-term loyalty.

# conclusion

When designed responsibly, AI agents in banking apps can significantly empower young people by providing:

- personalized financial knowledge
- empathetic yet expert guidance
- transparent and trustworthy interactions
- strong data protection
- clear AI labeling to prevent manipulation

We should present Leo as a system that adheres to all these points.