

Ethics and ING Leo



How to ensure that Leo is ethical

Investment Simulator

junior profile

- potential of encouraging risky, gamified trading mentality
- Teenagers may confuse simulation with real investing
- Gamification rewards and competition may be manipulative

Solution: Leo should not reward short-term risk taking. It will encourage the user to invest long-term and diversify. Leo should not feature a ranking table. Option for opting out.

(Stock Market Games to Teach Kids About Investing: More Harm Than Good?, n.d.)

Proactive AI suggestions

junior profile

- Profiling minors -> very sensitive under GDPR and EU AI Act (exploiting vulnerabilities related to age, disability, or socio-economic circumstances to distort behaviour, causing significant harm)
- Teens may interpret suggestions as commands
- High potential for manipulation/hidden advertising -> dark patterns

Solution: ensure transparency, always explain why Leo does what it does, require parental opt-in, avoid product-specific ads

(High-level Summary of the AI Act | EU Artificial Intelligence Act, n.d., sec. Prohibited AI systems (Chapter II, Art. 5))

Personalized Newsfeed

regular profile

- Requires profiling -> ads are forbidden for minors under 28.2 DSA

Solution: no ads in ING junior profile based on profiling, instead educational only content. Full transparency. Require parental consent. Option for opt-out. Curate content with partner Finfluencers

(Article 28, the Digital Services Act (DSA), n.d., para. 28.2)

„Providers of online platform shall not present advertisements on their interface based on profiling as defined in Article 4, point (4), of Regulation (EU) 2016/679 using personal data of the recipient of the service when they are aware with reasonable certainty that the recipient of the service is a minor.“

Article 28.2 DSA

Summary – junior profile

- avoid ads in junior profile
- data collection only for functional purposes
- teach long term investing
- full transparency
- clear AI labeling
- Require parental consent
- offer opt-out from data collection

Summary – regular profile

- avoid dark patterns and hidden motives (Leo must not try to sell ING products)
- Leo should maintain a professional, bank-like tone but still show understanding for different life situations (e.g. „I understand that it's frustrating to be in debt.”)
- Leo should never put pressure on the user - advise, not decide
- full transparency
- clear AI labeling
- offer opt-out from data collection

References

Stock market games to teach kids about investing: more harm than good? (n.d.). Retrieved November 28, 2025, from <https://www.totalcents.com/blog/stock-market-games-to-teach-kids-about-investing-more-harm-than-good#:~:text=Investing%20Is%20Not%20A%20Game>

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