

20:20 Financial Coaching Ltd - AI Ethics Policy

At 20:20 Financial Coaching Ltd (2020) is committed to using artificial intelligence (AI) responsibly, ethically, and with the best interests of those that we serve at heart. This policy outlines how we protect users information, ensure fairness, transparency, and safety in all AI-driven interactions.

1. Purpose of Our AI Tools

Our AI tools are designed to:

- Help users to increase their financial literacy and wellbeing.
- Provide personalised financial education and coaching
- Encourage better budgeting, saving, and long-term money decisions.
- They do not provide regulated financial advice and should not be used as a substitute for speaking with a qualified financial adviser.
- Any data gathered from using this tool will not be sold to financial institutions that could foreseeable result in financial behaviour that would be deemed as unethical. A good example would payday lending, predatory lending or organised crime.

2. Your Privacy & Data Security

We follow the UK GDPR, Data Protection Act 2018, and other relevant data laws, including the EU GDPR (if applicable).

Data Collection: We only collect the data we need to personalise your experience, such as your spending habits, goals, and financial challenges.

Data Use: Your data is used to generate educational insights, coaching suggestions and provide general financial education. 2020 may sell your data for the purposes of monetising the platform, but only to financial institutions that align with the company's core values. **The ethics of data harvesting must be weighed against monetising elements of the platform. Without some form of monetisation, our AI tools cannot be provided to financially vulnerable/low income demographics at low or no cost.**

Data Storage: All data is stored securely, encrypted in transit and at rest. We use reputable cloud providers with UK/EU-based servers or other GDPR-compliant storage solutions.

Data Retention: We keep your data only as long as necessary for the service we provide, or as required by law.

You can request a copy of your data or ask for it to be deleted at any time by contacting us.

3. AI Transparency & Limitations

We believe in honesty and transparency about how our AI works.

Our tools rely on machine learning and decision-tree models trained on anonymised, representative financial data sets.

The AI may guide you through questions or suggest coaching prompts based on your answers. Any version of our AI services will be rigorously tested on a representative sample of the intended user population before it is released to the general public.

Our AI does not make decisions for you – you remain in control of your financial choices.

4. Fairness & Bias

We work hard to eliminate bias from our AI tools:

We regularly test and audit our algorithms for racial, cultural, gender, or economic bias.

Our content is reviewed by a diverse panel of financial experts, and our models are trained on inclusive datasets.

We never promote or recommend financial products based on your ethnicity, gender, or other protected characteristics.

If users feel a result or prompt is biased or unfair, you can report it to us. We take every report seriously.

5. No Predatory Lending or Harmful Practices

We will never:

Encourage payday loans, high-interest debt, or predatory lending schemes.

Suggest actions that could worsen your financial or emotional wellbeing.

Recommend products from lenders or providers we have not vetted.

We aim to empower you — not exploit you.

6. Accessibility & Inclusion

We are committed to making our platform fully accessible to people of all abilities and neurotypes, including those with ADHD, autism, dyslexia, and anxiety. This includes:

Using clear, jargon-free language

Offering audio, visual, and text-based content

Ensuring mobile optimisation and screen reader compatibility

7. Continuous Monitoring & Human Oversight

Our AI is monitored by qualified humans who regularly review its performance.

If our AI is unsure, it will clearly say so and encourage you to speak with a coach.

We review any flagged sessions or unusual interactions.

8. Legal Compliance

We comply with:

UK GDPR and Data Protection Act 2018

EU GDPR (if applicable)

Financial Conduct Authority (FCA) guidelines on use of digital and AI tools (as a coaching platform, not an adviser)

The Consumer Duty (we aim to deliver good outcomes for all users)

9. Your Rights

You have the right to:

Know how your data is being used

Request correction or deletion of your personal information

Withdraw your consent at any time

Lodge a complaint with the Information Commissioner's Office (ICO)