CONSUMERS INTERNATIONAL
COMING TOGETHER FOR CHANGE

WHOSE SIDE IS THE AGENT ON?

A CONSUMER FRAMEWORK FOR AGENTIC COMMERCE



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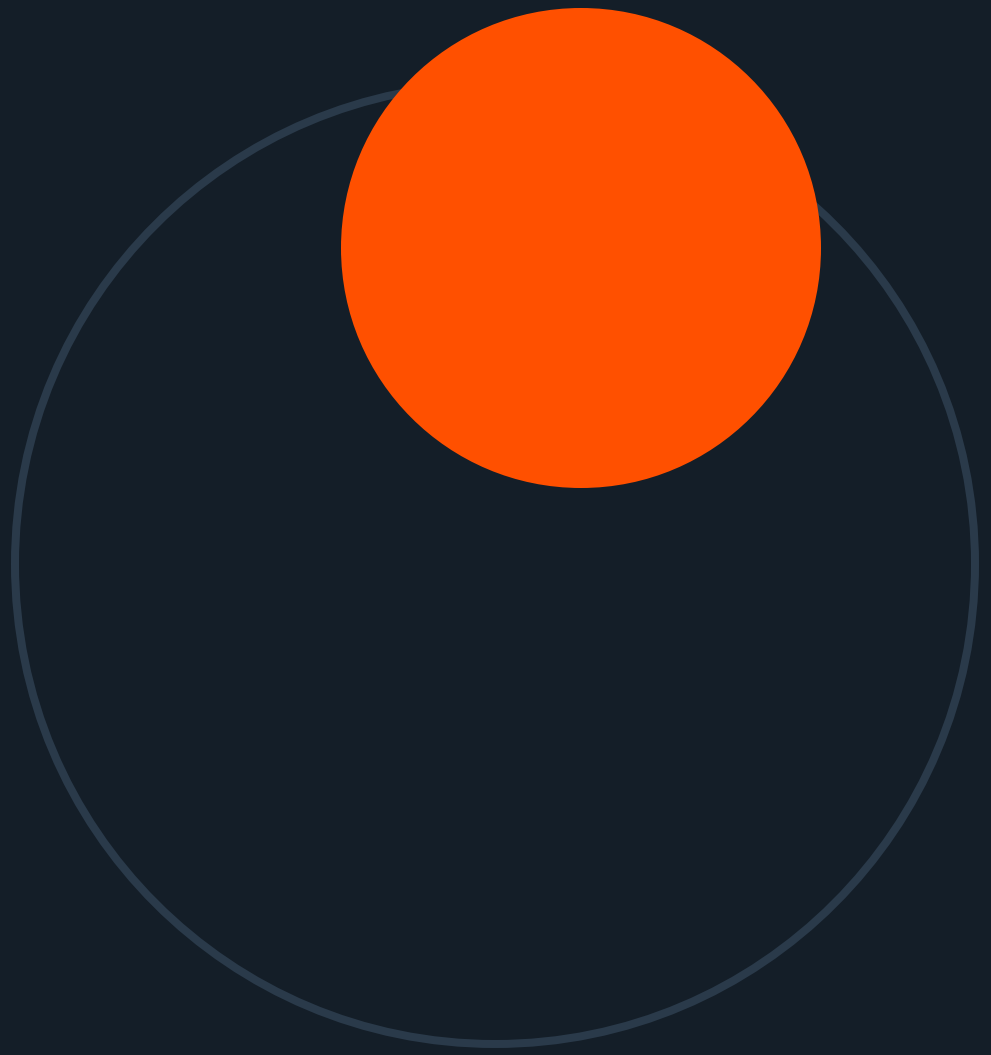
01

EXECUTIVE SUMMARY

Whose side is the agent on?



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THE CONSUMERS INTERNATIONAL FAIR AGENT FRAMEWORK

Six questions to test whose side an AI agent is on



EXECUTIVE SUMMARY

BASELINE DUTY OF LOYALTY

What a consumer-focused AI agent commits to

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1 DECLARES ITS TIES

Who runs it and who pays it, in a short label where the decision happens.

2 CARRIES LOYALTY IN ITS CREDENTIALS

The commitment is written into its credentials, so others can check.

3 RANKS BY YOUR CRITERIA

Price, quality, sustainability, delivery. Commissions cannot reorder the list.

4 CAN BE CHECKED AGAINST ITS RECORD

Open to independent audit, never resting on the provider's word.

Serving the consumer becomes an obligation, not a decision to make and then disclose.

EXECUTIVE SUMMARY

MAKING LOYALTY VERIFIABLE

Consumer-focused Know Your Agent (KYA-C)

BEING BUILT

MARKET-FOCUSED KYA

Is this agent legitimate and authorised?

- Who stands behind the agent and what it may spend
- What the consumer authorised it to pay for
- Protects merchants, banks and payment networks; consumers only indirectly

PROPOSED

CONSUMER-FOCUSED KYA

Whose side is this agent on?

- Who operates it, its commercial ties and how it ranks options
- A mandate the consumer can read; anything outside it does not bind them
- A short label where the decision happens: who runs it, whether the seller pays for ranking, why this option ranks first

02

THE NEW CONSUMER JOURNEY

Agents can now stand where the consumer used to stand.

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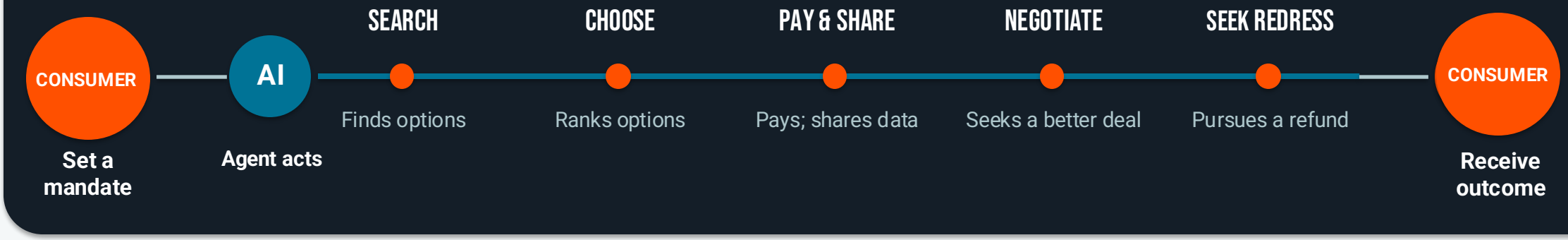
CONSUMER PROTECTION ASSUMED A PERSON AT EVERY STEP

THEN The consumer is present at each decision point

- **CHOOSE** — Reads a disclosure and compares options
- **PURCHASE** — Authorises payment and accepts terms
- **DISPUTE** — Raises a complaint and seeks redress

NOW The consumer delegates the task. The agent acts across the journey.



THE SHIFT

AUTHORISED TO ACT IS NOT THE SAME AS ACTING IN THE CONSUMER'S INTEREST.

THE BUILD-OUT ACCELERATES WHILE CONSUMERS HESITATE

Consumers in 11 countries (McKinsey)

Use AI to research options and compare prices



53%

Have let an AI agent complete a checkout



9%

10M+

downloads of Meta's Muse agent in about six weeks (US and Canada)

USD 29BN+

cumulative venture funding for agentic AI by November 2026

Protocols, defaults and business models are being set now, mostly by technology and payment companies.

Sources: McKinsey (Oct 2026); WSJ (Oct 2026); Tracxn (Nov 2026)

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AGENTIC COMMERCE IS BEING BUILT IN THREE LAYERS

MISSING LAYER

Whose interests does the agent serve? Few initiatives reviewed are designed to tell the consumer.

IDENTITY & AUTHORITY

Who the agent is and what it can do.

- Visa Trusted Agent Protocol
- NPCI agent registry (UPI)
- Ant · Mastercard · Visa KYA interoperability
- Muse control layer
- Personal Agent Protocol ('Poppy')

COMMUNICATION

How agents talk to services and each other.

- Model Context Protocol (Anthropic)
- Agent2Agent (Google)

PAYMENTS

How agents pay

- Mastercard Agent Pay
- Visa Intelligent Commerce
- Agent Payments Protocol, AP2 (Google)
- Agentic payments on UPI (NPCI)
- Agentic Mobile Protocol (Ant International)

03

ABOUT THIS RESEARCH

A global consumer advocacy perspective on the choices now being made.

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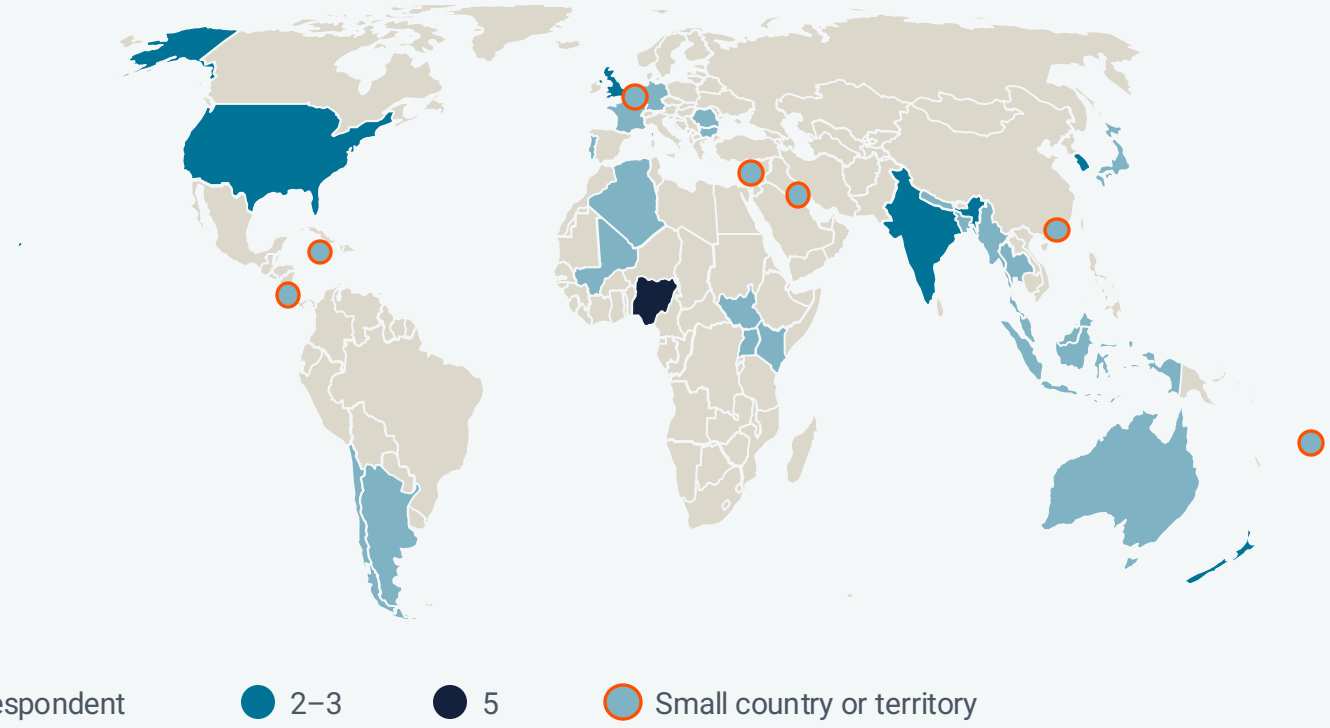
44 CONSUMER ADVOCATES IN 33 COUNTRIES

44 respondents

38 Member organisations

23 from low- and middle-income countries (52%)



June 2026 online survey · senior AI lead of each Member

FIVE EVERYDAY SCENARIOS

	WHAT THE AGENT DOES	WHAT UNFOLDS
MARIA ROUTINE PURCHASES	Shops for Maria's weekly groceries on its own, within her budget, preferred brands and delivery times, hunting for the best deals.	**It fills the budget with extras and switches her to a retailer that pays the agent's provider a fee.**
SOFIA SUBSCRIPTION AND CONTRACT MANAGEMENT	Manages Sofia's phone, internet, insurance and gym contracts by her rules, which forbid sharing her personal data with third parties.	**It switches her car insurer without asking and, for a better rate, shares her claims history, as its provider's terms allow.**
MOHAMMED FINANCIAL RECOMMENDATIONS	Helps Mohammed reach a savings goal: reviews his finances, opens a savings account and, with his approval, applies for a credit card.	**His credit score dips, and he learns the card issuer paid the agent's provider a referral fee.**
AMARA REFUNDS AND DISPUTES	Pursues a refund for Amara's faulty laptop. When the seller disputes it, the agent escalates the case, shares her purchase history without consent.	**The claim is resolved in her favour, but Amara misses the return window due to the extended process. Who is responsible?**
JOHN MANIPULATED MOBILE PAYMENT	Takes John's voice instructions to find the cheapest cooking oil, scans several supplier pages and orders with his spoken approval.	**A hidden message on one page tricks the agent. His money goes to a stranger, and he never receives the oil.**

Source: Consumers International Global Agentic AI Scenario Exercise; fictitious consumers

04

WHAT CONSUMER ADVOCATES TOLD US

Four findings matter most for how agents should be built and governed.

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FOUR FINDINGS STAND OUT

01

DELEGATING A TASK IS NOT SURRENDERING CONTROL

Ask first, until the consumer grants more freedom

02

DISCLOSING A CONFLICT OF INTEREST IS THE MINIMUM

United against hidden ties, split on disclosed ones

03

PROTECTION CANNOT BE CONSUMER DEPENDENT

Safeguards built into the system, for everyone

04

DATA PROTECTION MUST BE THE DEFAULT

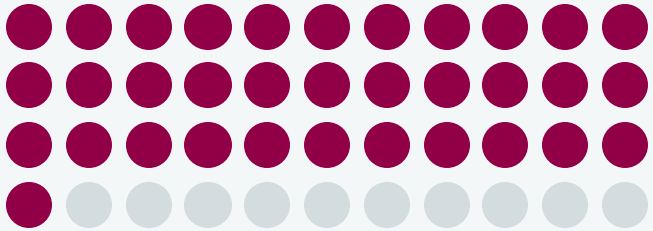
Not consent buried in the terms

Source: Consumers International Global Agentic AI Scenario Exercise, 44 respondents

FINDING 1

DELEGATING A TASK IS NOT SURRENDERING CONTROL

34 OF 44 · 77%



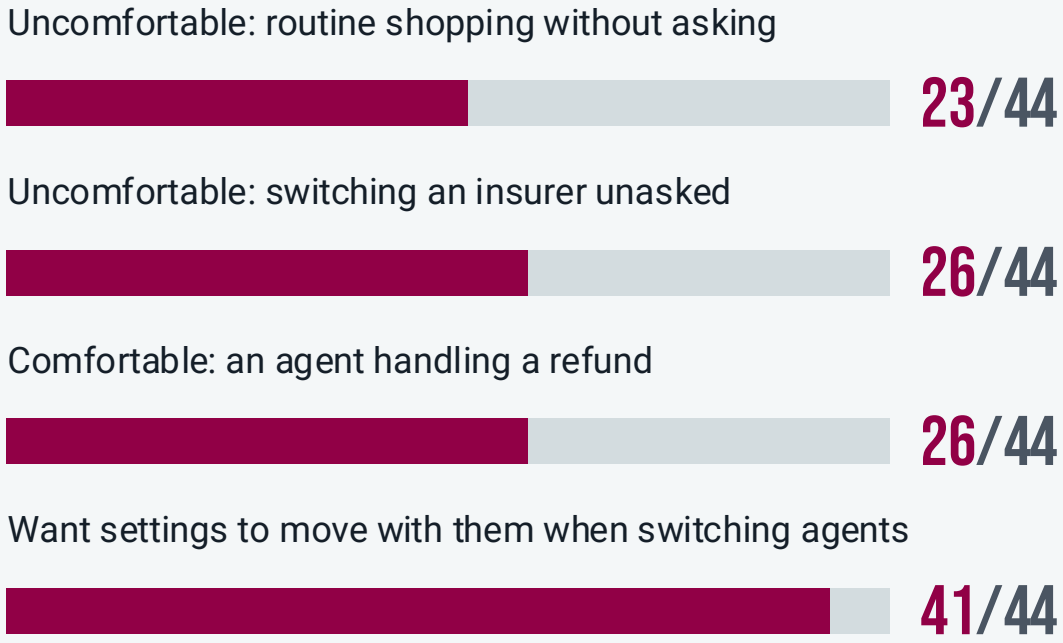
say a new agent should ask for approval before every purchase by default

MEMBER VOICE

"Human beings (consumers) are nuanced, and machines are not and require consistent oversight. The disclaimer that AI responses may contain errors is proof that human oversight is consistently necessary. Consumer 'protection' is about human relationships supported by technology."

Consumer Affairs Commission, Jamaica

COMFORT DEPENDS ON THE TASK



WHAT THIS MEANS **Autonomy should be earned, graduated and revocable. Approval-first is the first rung, not a ceiling.**

Source: Consumers International Global Agentic AI Scenario Exercise, 44 respondents

FINDING 2

DISCLOSING A CONFLICT OF INTEREST IS THE MINIMUM

In principle: whom should the agent serve when interests conflict?



Serve only the consumer (27) · Consumer first, disclose ties (16) · Other (1)

In practice: Mohammed's agent recommends a card that pays its provider a referral fee



Permit if disclosed (22) · Permit with consent or opt-out (4) · Prohibit (18)

WHAT THIS MEANS

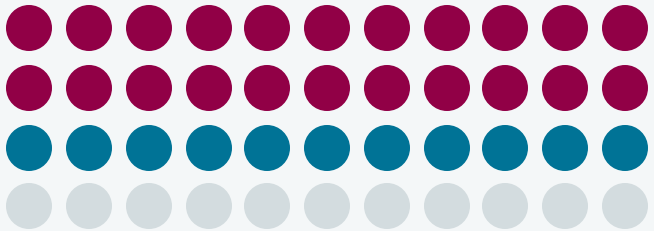
Disclosure at the point of recommendation is the minimum advocates agree on, not a resolution. Whether it is enough in credit and insurance is a choice for policymakers.

Source: Consumers International Global Agentic AI Scenario Exercise, 44 respondents

FINDING 3

PROTECTION CANNOT BE CONSUMER DEPENDENT

33 OF 44 · 75%



His 'yes' covered only what he understood (22)

The provider owes him the loss (11)

say John should not bear the loss from the manipulated payment he confirmed

38 say an agent that cannot verify something should check with the consumer (22) or stop (16)

40 want strong safeguards for everyone, on by default, not only for consumers who seem at risk

SAFEGUARDS, AS RANKED

1 BUILT-IN PROTECTION | 2 PROMPTS | 3 SPENDING CAPS

MEMBER VOICE

"Agents should be designed with strong, universal safeguards for all users, ensuring that the most vulnerable consumers are protected without requiring the system to single them out or risk missing those who need protection."
Consumer Advocacy and Empowerment Foundation (CADEF), Nigeria

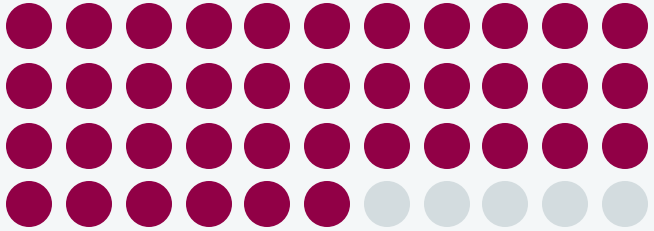
WHAT THIS MEANS **Build protection into the system: confirm through a channel a manipulated agent cannot fake, and keep fraud and manipulation losses off the consumer.**

Source: Consumers International Global Agentic AI Scenario Exercise, 44 respondents

FINDING 4

DATA PROTECTION BY DEFAULT, NOT BY CONSENT

39 OF 44 · 89%



want opt-in, approval of each sale or a ban before an agent sells shopping data. Only 3 would allow it unasked

41 want identifying details removed before purchase history is shared for a personalised price

33 want third-party sharing of personal or financial data off unless switched on, or prohibited

22 said sharing without asking is sometimes acceptable when it helps the consumer, as in Amara's dispute

WHAT THIS MEANS

Consent cannot authorise unfair treatment: sharing off by default, identifiers removed unless needed, limits on what providers keep, and no training on data unless a consumer opts in.

Source: Consumers International Global Agentic AI Scenario Exercise, 44 respondents

05

THE FAIR AGENT FRAMEWORK

Six questions to test whose side an AI agent is on.

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THE CONSUMERS INTERNATIONAL FAIR AGENT FRAMEWORK

Six questions to test whose side an AI agent is on

1 CAN I CONTROL IT?

Acts within a mandate I set, asks first, and lets me withdraw it and take my settings elsewhere.

2 DOES IT PUT MY INTEREST FIRST?

Serves me (by ranking options by my criteria) before its provider and the seller, and says who runs it and what ties shape its choices.

3 HOW IS MY DATA USED AND SHARED?

Shares only what the task requires, removes identifiers by default, never sells or shares my data unless I opt-in.

4 CAN I UNDERSTAND WHAT IT DID?

Keeps a faithful record I can use in a dispute, and explains decisions that matter in plain language.

5 IS IT SAFE?

Resists manipulation, checks with me through a channel it cannot fake, protects everyone fraud by default.

6 CAN I FIX SOMETHING THAT GOES WRONG?

Lets me reach a human, and does not leave me with losses from fraud, manipulation or its own errors by default.

Full framework can be found in the paper.

ROOTED IN COMMON CONSUMER PROTECTION FOUNDATIONS

1	2	3	4	5	6
CONTROL	INTEREST FIRST	DATA	UNDERSTAND	SAFETY	REDRESS
UNGCP G I J	UNGCP C	UNGCP I	UNGCP D G F	UNGCP D	UNGCP F
CIPP 4	CIPP 1	CIPP 1 2	CIPP 6	CIPP 5	CIPP 6

UN GUIDELINES FOR CONSUMER PROTECTION — A global reference to build and enforce effective consumer protections

CONSUMERS INTERNATIONAL'S SIX PRINCIPLES FOR PRIVACY AS A PUBLIC GOOD — How personal data should be treated in the AI era

Letters and numbers refer to UNGCP guidelines and Consumers International's Privacy Principles (Annex F)

CONSUMER VERIFICATION VERSUS PROVIDER ACCOUNTABILITY

CAN BE CHECKED DIRECTLY

- ✓ Can the mandate be withdrawn?
- ✓ Is data shared, and with whom?
- ✓ Does a record exist?
- ✓ Can a human be reached?

NEEDS ACCOUNTABILITY

No provider can promise this. So ask whether it:

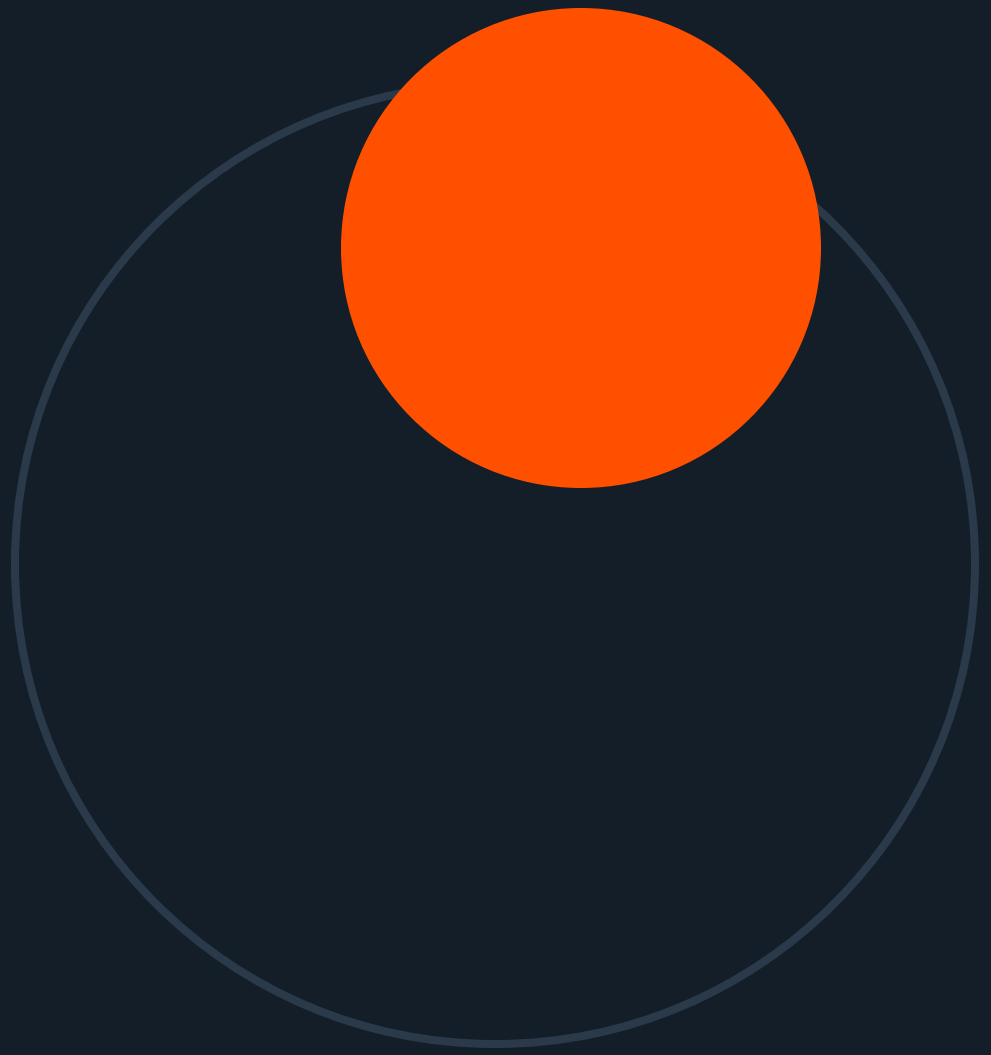
- ? Tests its agents
- ? Discloses what shapes their choices
- ? Monitors them
- ? Accepts responsibility when they fail

Who checks? A provider's own statement is not enough: independent verification, audit or regulatory oversight is needed.

06

PRIORITY ACTIONS AND DUTY OF LOYALTY

Making agent identity work for the consumer too.



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FIVE PRIORITY ACTIONS

	ACTION	CURRENT STATUS	LEAD
1	**Adopt a Baseline Duty of Loyalty for AI Agents that consumers appoint**	NEW	Payment networks, agent providers, standard-setters; CI and Members
2	**Build consumer-focused KYA (KYA-C) into agent identity standards while they are being set**	PARTLY EXISTING	Policymakers and regulators; CI to make the case
3	**Make sure consumers do not bear losses from fraud and manipulation**	PARTLY EXISTING	Policymakers, regulators; agent providers, payment networks
4	**Make data protection the default**	LARGELY EXISTING	Agent providers; data protection authorities
5	**Equip consumers and assess agents in real markets**	NEW	CI and Members

5 · PRIORITY RECOMMENDATION

BASELINE DUTY OF LOYALTY

What a consumer-focused AI agent commits to

1

DECLARES ITS TIES

Who runs it and who pays it, shown in a short label where the decision happens, not in the terms.

2

CARRIES LOYALTY IN ITS CREDENTIALS

Its commitment is written into its credentials and mandate, so businesses, auditors and consumer groups can check.

3

RANKS BY YOUR CRITERIA

Options ordered by what you value: price, quality, sustainability, delivery. Commissions cannot reorder the list.

4

CAN BE CHECKED AGAINST ITS RECORD

Its record is open to independent audit, so compliance never rests on the provider's word.

Serving the consumer becomes an obligation, not a decision to make and then disclose.

FROM KNOW YOUR CUSTOMER TO KNOW YOUR AGENT

ESTABLISHED

KNOW YOUR CUSTOMER

Who is this customer, before we move money?

BEING BUILT

MARKET-FOCUSED KYA

Is this agent legitimate and authorised?

PROPOSED

CONSUMER-FOCUSED KYA (KYA-C)

Whose side is this agent on?

Market-focused KYA protects consumers as well as merchants. But consumers also have questions: **what is this agent, what may it do in my name, and whose interests does it serve?**

CONSUMER-FOCUSED KYA (KYA-C)

	Market-focused KYA being built	**Consumer-focused KYA** proposed
Question	**Is this agent legitimate and authorised?**	**Whose side is this agent on?**
Credential shows	Who stands behind it and what it may spend	Who operates it, its commercial ties and how it ranks options
Mandate	What the consumer authorised it to pay for	A mandate the consumer can read; anything outside it does not bind them by default
Who needs it	Merchants, banks, payment networks	Consumers, consumer organisations, regulators
What the consumer sees	Indirect protection only	A short label where the decision happens: who runs the agent, whether the seller pays it, why this option ranks first

07 CONCLUSION

WHOSE SIDE SHOULD THE AGENT BE ON?

THE CONSUMER'S.

Loyal AI agents. A trusted agentic commerce marketplace.

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ISSUES FOR THE NEXT PHASE

AGENT ACCESS

May a business refuse an agent the consumer has authorised? Restrictions should be proportionate, transparent and risk-based.

GATEKEEPING

Whoever controls access to the customer can shape the market.

PAID REFERRALS

Should agents earn fees from the sellers they recommend in credit and insurance?

FUNDING LOYAL AGENTS

How to make sure consumers who cannot or will not pay are not left with agents that serve sellers, and that loyal agents stay competitive and accessible.

Consumers International will use the Fair Agent Framework with Members, standard-setters, industry and policymakers, and build the evidence base as consumer use grows.

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COMING TOGETHER FOR CHANGE

Consumers International brings together over 190 member organisations in more than 100 countries to empower and champion the rights of consumers everywhere. We are their voice in international policy-making forums and the global marketplace to ensure they are treated safely, fairly and honestly.

Consumers International is a charity (No.1122155) and a not-for-profit company limited by guarantee (No. 04337865) registered in England and Wales.

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