Can your fraud-decisioning AI show its work?

What a defensible system must produce and the questions that expose a black box

The AI Act's deadline moved.
The standard a bank has to meet did not.

The AI Act's high-risk deadline slipped to 2 December 2027, and fraud detection sits outside the high-risk regime altogether (Recital 58).
No deadline is forcing this.

But a disputed payment, an ombudsman, your own second line, and the incoming PSD3/PSR liability all ask the same thing: show me why. A score and a confidence value still doesn't tell you what actually happened.

Make it a buying criterion.

Evidence-producing decisioning earns its place on defensibility, and it did so before the Act existed. Treat it as a procurement standard and adopt it now, while no deadline is distorting the choice; explainability bought today is an architecture decision; demanded in 2027, it is a migration.

What Nyx does

1. Actively hunts for fraud. It does not wait for an alert to fire.
2. Investigates every case forensically, not a sample.
3. Builds deep cases in under 5 minutes, rather than hours of manual review.
4. Learns from every case, and can propose a new rule to implement.
5. Attaches the evidence to each case: logged, timestamped, replayable, exportable.
6. **The decision stays with your analyst.**

Put it in your evaluation

The evidence to ask for:

- **A per-decision record.** Inputs, reasoning, reviewer, time; exportable.
- **Logs kept six months or more.** (Art. 26(6))
- **Human authority, documented.** (Art. 26(2))
- **Replayability.** Any past decision as it was made.
- **Limitations and failure modes, in writing.** (Art. 26(2))
- **Provider clarity if you retrain on your data.** (Art. 25(1)(b))

Four questions for any vendor

- ? Show me the decision record for one specific alert: inputs, reasoning, reviewer, time, exportable.
- ? Which provision do you rely on for your AI-Act classification? Show the intended-purpose documentation.
- ? Give me your known limitations and failure modes, in writing.
- ? If we retrain on our own book, who becomes the "provider"?