

Your details

Q1: Title (e.g. Mr, Mrs, Ms, Dr, etc) [✂]

Q2: Forename [✂]

Q3: Surname [✂]

Q4: Email [✂]

Q5: What is your role / profession?

Director

Q6: Are you representing yourself or an organisation? Yourself

Publishing your details

Q7: If you are representing yourself rather than an organisation would you be content for us to include your name when we publish your response? No

Your organisation

Q8: What is the organisation's name? Respondent skipped this question

Q9: Please could you briefly explain the role of your organisation, including the sectors in which it operates or has most interest? Respondent skipped this question

Theme 1: Consumers' perceptions, use and experience of DCTs

Q10: 1. When and why do consumers use DCTs? To what extent do they trust them?

I use DCTs for planes, energy, insurance, car hire for overseas.

They are better than phoning around, but they're not perfect. For some insurance, I trust a broker more.

I have not switched my light and heat for 4 years. I tried and get this -

It looks like the electricity supply number you've entered is incorrect. It can be found on the last page of your electricity bill, where it will be called supply number, "S" number, MPAN or electricity supply number. It is always 13 digits in length, broken into four groups. If you don't have your bill, you can call your current supplier for help.

But I don't have any bills to check for my supply number so the service is useless.

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I would much rather the Utility company was obliged to inform me every 6 months whether I was on the best deal. It should be for them to do this with regulation to require it.

Q11: 2. How do consumers choose which and how many DCTs to use?

I never know which is best. I type in google and look. Or a friend may say a name.

How many - it's a matter of time, effort and reward. Of course it would be easier if it was a " proper, complete market " and there was only one website that aggregates all the DCTs and that did it all.

I don't like the ones that spam you with emails and offers after you have used them. I drop them.

Q12: 3. What are consumers' expectations of DCTs - for instance in terms of market coverage and the relationships between DCTs and the suppliers they list?

My expectation is that DCTs cover the whole market ; my instinct is they do not.

They do list things now a bit more clearly e.g. on this one you get a message

You are seeing the whole market. To see only plans that uSwitch can switch you to, use the filters below. Based on the details you entered, we calculate your personal projection for the next 12 months to be [X]

Q13: 4. What are consumers' experiences of using DCTs? Do they benefit from using them and, if so, how? What works well and what could be improved?

Overseas car hire works in as far as you know. But you never know if everything has been found by the DCT. Also how much commission they may take. It is an opaque process.

But the prices seem ok, it is the extras you never hear about. Also charges at the airport. It's a difficult and annoying process to rent a car.

Theme 2: Impact of DCTs on competition between suppliers of the services they compare

Q14: 5. What factors influence suppliers' use and choice of DCTs and why?

not applicable

Q15: 6. To what extent do DCTs make it easier for suppliers to enter the market, attract more consumers and engage more effectively with them?

not applicable

Q16: 7. How have DCTs affected competition between suppliers? What impact has this had on the price, quality and range of products offered by suppliers? n/a

Q17: 8. What are the barriers, if any, to DCTs increasing competition between suppliers, and how can these be overcome?

n/a

Q18: 9. In what ways, if any, have DCTs changed suppliers' approach to consumers - for instance in terms of whether they treat consumers who use DCTs differently to those who do not? n/a

Theme 3: Competition between DCTs

Q19: 10. In what ways do DCTs compete with each other - for instance in terms of coverage, the savings consumers can make, the services they provide, their ease of use, transparency and how they protect consumers' data?

there is no competition in anything other than the google ranking and adverts

as a consumer I cannot differentiate on any of the items in the list a Q 10

For example- to differentiate in ease of use, I would need 10 windows open on my PC. I won't do that.

But an aggregator might.

Q20: 11. What factors influence how effectively DCTs can compete - for example, whether they can secure the necessary consumer data, supplier information or other data?

I would like to hold my personal data and then volunteer it to the market and receive a quote.

But that is not the way the DCTs work. The system is set up for the organisation to take your personal data, hold the data, and to make their money from that.

No-one knows what happens to the personal data that the DCTs take from you. Most people might imagine it is used again to make them a profit. It is opaque.

Q21: 12. If there are barriers to competition between DCTs, how significant are these and how can they be overcome?

My impression would be that DCTs agree with one another how to behave so as not to buck the market. Each one may be content with their 10 to 15 % market share and margin

Can the barriers be overcome ? with difficulty, but aggregators in some markets e.g. airlines may show nearly 100% of the deals on offer and therefore promote more competition

But it's impossible to know what's going on as a consumer

Theme 4: The regulatory environment

Q22: 13. Are there any areas of regulation or self-regulation applying to DCTs that lack clarity, certainty, consistency, or enforcement?

Personal data, privacy and re-sale of personal data is completely opaque to consumers

The moment I touch their sites, the DCT is crawling over me e.g.

[✂]

Q23: 14. Do there appear to be any areas where DCTs may not be meeting competition or consumer protection requirements?

Personal data is very possible and re-sale of personal data

They are not protecting the consumer, they are mining and appropriating them e.g. so called " privacy policy "

5. Who do we share your information with?

When you use any of our Services, you consent to us disclosing your personal information to the following parties:

.....
[X]

In other words, there is no opt in ; no informed consent and this is effectively fraud or theft of the consumer's personal data.
GDPR will not allow this and the DCTs should stop now.

Q24: 15. Do any aspects of regulatory approaches to DCTs need to change and, if so, why?

Clarity and openness for the consumer

The CMA is not necessarily aware of the extent of personal data appropriation and mining. What happens to the personal data as it should not be re-sold and re-used, but the Terms and Conditions mean it is and the consumer is blind to this.

This should be changed as GDPR will prevent it. It is also a consumer rip off as there is no realisation.

Future developments, other comments and further contact

Q25: 16. Finally and in relation to all of the issues above, what likely developments over the next three years should we take into account and why?

DCTs and personal data - the moment you touch their web site, they are potentially selling all the personal data.

The CMA should follow the money here. google and search engine ranking - because this allows a DCT to buy business if the consumer is not aware completeness - if the DCT only offers 50% of the total market, the consumer is being conned

personal data - the DCTs do not make money from the service, they make it from the personal data trading and selling. What do the DCTs do with all the personal data ; do they re-sell it and re-use it ; what are the legals and T&Cs ?

The CMA must follow the data monetisation in transactions and see how much of the DCT's profits are made from that data monetisation rather than from the e.g. car rental company commission for referral service

The DCT service providers may possibly come under severe strain with GDPR as the personal data trading business model becomes illegal or opt in and stops that revenue stream

[X] is owned by [X] - this is another data monetisation service, and data sale to third parties that will be threatened by GDPR and robust consumer protection

[X] admit that they simply sell the data in the [X] Privacy Policy [X].
We may also share your personal information with third parties

We may also share with or sell to third parties aggregate information or information that does not personally identify you.

It is not possible to aggregate information and de-identify.

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[X] may also store the personal data in Russia, China or anywhere else. The UK consumer will have no idea of this.

[]

Q26: Do you have any other comments you would like to add?

The terms and conditions on all the DTCs with respect to personal data are most likely in contravention of the DPA and the GDPR coming in May 2018.

No member of the public reads them and their personal data is being re-used, sold on and potentially or probably monetised probably without their consent.

Take [X] - they say this, but they do not actually mean one word [X]

Q27: Would you be willing for us to contact you to discuss your response? Yes
