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Response to provisional decision on Mobile browsers and cloud gaming market investigation

Vivaldi, launched in 2016, is a powerful, personal & private web browser (for desktop, mobile and in-car) that adapts to its users and offers more features than any other modern browser.

Vivaldi's has two ground rules: privacy is a default, and everything's an option. In practice, this means building software that protects users' privacy but also does not track how they use it. Vivaldi believes private and secure software should be the rule, not the exception.

Vivaldi is headquartered in Norway, with satellite offices in Iceland and USA. It has no external investors and is co-owned by its approximately 50 employees.

There are currently 3,100,000 active users world-wide, [REDACTED] of whom are in UK (as are [REDACTED] employees).

Progressive Web Applications

We're very happy to see PWAs addressed in the provisional decision. We would like Apple to be required to level the playing field that it has skewed for so long, by providing a public iOS API that allows third-party browsers to implement PWA install prompts which programmatically trigger the Add To Home Screen function. This should also be available to browsers that use their own engines, so they can offer this functionality even if Safari chooses not to. PWAs should open in the browser that installed them.

As noted in 5.110, Google restricts access to the WebAPK system so Chrome is uniquely able to install PWAs on Android devices as native applications. Google should be required to open the WebAPK system to other browsers on Android.

In-App browsers

Apple should be required to direct any in-app browsing to the user's default browser on iOS, in order that the user's chosen privacy, security and accessibility settings be honoured.

Google must remove the ability to override a user's choice of default browser via Chrome Custom Tabs (including iOS if Google ships a Blink-based browser for iOS).

Anti-circumvention

We note from 11.103 - 11.111 that CMA is aware of Apple's attempts at [REDACTED] with the EU Digital Markets Act, and are appreciative of this.

We agree with the CMA's provisional conclusion that both Apple and Google's product design choices make it significantly harder for consumers to drive competition by actively choosing which browser they use. We urge the CMA to liaise with their regulator colleagues in the EU, and consult with competitor browser vendors when specifying remedies, particularly the design of 'choice screens' and where they occur in the user flow.

Conclusion

We're grateful for the CMA's diligence in this investigation, and are hopeful that when the Digital Markets, Competition and Consumers Act comes into force in 2025 that the CMA can move swiftly to establish genuine competition in the mobile browser market in the United Kingdom.