

[Financial Services Firm]

Response to the CMA consultation

‘Proposed Decision: SMS Investigation into Google’s Mobile Platform’

Submitted on 1 September 2025

## EXECUTIVE SUMMARY

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1. As a leading UK financial services provider, we strongly support the CMA's proposed Strategic Market Status (SMS) designation for Google and the efforts to address its entrenched market power in mobile ecosystems. Given its platform (along with Apple's) is an indispensable gateway to digital services, we believe regulatory intervention is essential to restore competition, foster innovation, and protect consumer choice.

### Digital Activities Definition

2. We agree with the CMA's definitions of smartphone and tablet operating systems, native app distribution, and mobile browsers/browser engines, but with **some important caveats**. We urge the CMA to explicitly recognise that these systems are not merely intermediaries—they are **gatekeepers to critical device functionalities**. These features are foundational to financial services, and their restriction constitutes a direct barrier to competition. We also recommend that **NFC access and digital wallets must be treated as a core competitive lever. The CMA's designation does not currently cover Google's wallet itself, which we view as a gap in scope that could undermine the effectiveness of any remedies. We also urge the CMA to clarify that digital wallets are fully within scope of the current SMS designation, and to use the designation to put in place the conditions needed to allow competition from alternative wallets.**

### Mobile Platform Aggregation

3. While we understand the rationale for grouping these digital activities into a single "mobile platform," we caution that **bundling may obscure important differences in control and competitive dynamics. We recommend maintaining analytical separation to enable targeted and proportionate remedies across distinct layers of the ecosystem.**

### Competitive Constraints

4. We agree with the CMA's finding that Google faces limited competitive constraints. **It is a necessity for our business that we distribute on both Android and iOS. Our objective is to provide mobile banking services for all our customers. Android has fewer customers (and fewer higher value customers) but still constitutes a large customer base.**

### Barriers to Entry

5. We concur with the CMA's assessment of high barriers to entry - this applies to Android as much as to other ecosystems. While Android is often perceived as more open than iOS, the reality is that Google's control over key components—such as the Play Store, mobile operating system, and browser engine—creates structural limitations that are difficult for new entrants and competitors to overcome. These barriers to entry and expansion are exacerbated in the case of digital wallets, where Google's pre-installation of its own wallet, along with ecosystem-level self-preferencing, ensures that alternative wallets are disadvantaged from the outset. Google's merchant networks, secured over years (with our promotional support) and deeply integrated into their platforms, require regulatory intervention to free up. Google's entrenched position stifles innovation and limits consumer choice.

### Lack of Disruptive Developments

6. We agree that there are no foreseeable developments which are likely to erode Google's market power over the next five years. **Only targeted regulatory intervention can address the structural barriers and enable effective competition.**

#### **Substantial and Entrenched Market Power**

7. Google's end-to-end ecosystem control, lack of substitutes, and strategic gatekeeper role confirm its substantial and entrenched market power (SEMP) and position of strategic significance (POSS). We have not developed a standalone digital wallet on Android, due in part, to the structural barriers created by Google's entrenched market power. The self-preferencing, such as the default positioning of Google Wallet, makes it difficult to gain meaningful consumer traction. These conditions discourage investment and innovation by third-party providers, even those with established customer bases.

#### **Recommendations**

8. We urge the CMA to:
- **Explicitly include digital wallets and all connected devices** (e.g. smartwatches) **within the SMS designation** to ensure its ability to apply remedial measures to Google's ecosystem is not undermined.
  - **Prohibit self-preferencing**, including default settings and pre-installation advantages.
  - **Enable alternative app distribution channels to reduce gatekeeper bottlenecks.**
9. In summary, we support the CMA's proposed designation of Google and strongly recommend that the Google Wallet, digital wallets, and all connected devices are explicitly included within scope. We believe their mobile platform market is characterised by high and persistent barriers to entry and expansion, which reinforces its market power and limits the scope for meaningful competition. We have outlined additional actions that we believe are essential to ensure the digital economy functions effectively. We agree with the CMA that measures are needed to ensure a higher quality user experience, greater consumer choice, and lower prices and to enable businesses across the UK to thrive and unlock opportunities for all mobile platform participants—to invest, innovate, and grow. We would be happy to discuss our response in more detail.

## ANSWERS TO THE QUESTIONS

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**Question 1: Do you have any views on our proposed descriptions of the relevant digital activities, namely: (i) the smartphone operating system, (ii) the tablet operating system, (iii) native app distribution, and (iv) mobile browser and browser engine?**

1.1 We welcome the CMA's proposals and the focus on the evolving digital landscape. With some important caveats, we consider the proposed descriptions appropriately reflect the core components of Google's mobile ecosystem and their role in enabling digital services. However, the CMA should consider the following:

- a. **Smartphone and Tablet Operating Systems:** we agree that these operating systems act as intermediaries between hardware and software, enabling applications and services to function. However, **we believe the CMA should explicitly recognise that these systems also serve as gatekeepers to critical device functionalities**—such as NFC access, biometric authentication, and Trusted Execution Environment (equivalent to iPhone's secure enclave) usage—which are essential for financial services like digital wallets and secure banking apps. **The potential for such gatekeeping to restrict competition should be within scope of the CMA's designation.**
- b. **Native App Distribution:** we strongly support the inclusion of native app distribution as a distinct digital activity. On Android, while alternatives like Samsung Galaxy Store exist, Google Play Store remains dominant, and fragmentation limits the viability of other stores.
- c. **Mobile Browser and Browser Engine:** we agree with the CMA's inclusion of mobile browsers and browser engines, which are critical for accessing web-based services. While iPhone users can download browsers other than Safari, and Android users browsers other than Chrome, Safari remains the default browser on 88% of iPhones and Chrome on 77% of Android phones.<sup>1</sup>

1.2 **We appreciate the CMA's efforts to define these activities clearly and encourage further refinement to ensure that all relevant functionalities—especially those critical to financial services—are captured within scope. The CMA's designation does not currently cover Google's Wallet itself, which we view as a gap in scope that could undermine the effectiveness of any remedies.**

1.3 Specifically, wallets are an increasingly critical technology in a range of markets and services: Google has market power (dominance) over its mobile ecosystems (as does Apple with its), and there are significant benefits to customers from expanded competition for wallets and other services.

1.4 We do recognise that the concern with Google is not, on its face, as acute as with Apple. However, as the CMA recognises in its Roadmap, there is a real need to ensure, for instance, that Google's choice architecture in relation to (among other things) digital wallets, supports active user choice and does not give Google's own products and services an advantage over those of third parties. We are concerned that Google is sufficiently regulated to avoid the need for the court cases that have had to be run, for instance, in the EU.<sup>2</sup>

1.5 **We urge the CMA to clarify that digital wallets are fully within scope of the current SMS designation, and to use the designation to put in place the conditions needed to allow real and effective competition, on a level playing field, from alternative wallets.** Regulation is imperative and it will need to ensure that third parties are provided with viable commercial access terms, restrictions on the ability for Google (and Apple) to self-preference (including default settings), and third-party access to key Android features that are critical to the customer experience.

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<sup>1</sup> The future of mobile browsers: time for a new model? | TechRadar.

<sup>2</sup> Case C-738/22 P | Google and Alphabet v Commission and Case C-233/23 Alphabet Inc. and Others v AGCM.

**1.6 Connected devices scope should be expanded:** The CMA’s provisional decision is not clear on the inclusion of Google’s WearOS in the SMS designation. We strongly believe that connected devices such as smartwatches, alongside digital wallets, should be explicitly included in the CMA’s SMS designation. Connected devices are integral to payment behaviour in the UK, with a growing share of transactions now taking place via wearables such as smartwatches. The CMA has already acknowledged how the approach to connected devices can strengthen and cement market power, the importance of interoperability for users, and the potential need for remedial action (in its July 2025 Roadmap). These considerations apply and require to be remedied in relation to Google. Excluding certain connected devices (particularly smart watches) would risk leaving a significant gap in regulatory coverage and the opportunity for Google to reinforce its market power on an enduring basis.

**Question 2: Do you have any views on our provisional conclusion that it would be appropriate to treat those activities as a single digital activity, referred to as a mobile platform, whose purpose is to facilitate interactions between users and providers of digital content and services on Android mobile devices in order to allow users to access, view and engage with such content and services on their mobile devices?**

2.1 We broadly welcome the steps proposed by the CMA and understand the underlying logic behind grouping the mobile operating system, native app distribution, and mobile browser/browser engine as a single digital activity—referred to as a “mobile platform.” However, it is not currently clear why the CMA considers bundling these components together to be the most appropriate approach in ensuring effective competition. Each of these elements plays a distinct role in facilitating user interaction with digital content and services, and we are concerned that grouping them may risk overlooking important differences in functionality, control, and competitive dynamics.

2.2 Accordingly, we would appreciate further clarity on the rationale behind this proposed bundling. If the CMA believes that treating these components as a unified platform enhances its ability to assess market power and deliver effective remedies that benefit consumers and promote competition, then we would be supportive of that approach. **Our priority is ensuring that any framework adopted by the CMA enables meaningful intervention and reflects the realities of how digital ecosystems operate.**

2.3 While we recognise that these components are interrelated and collectively shape the user experience on mobile devices, we believe that aggregating them into a single digital activity risks oversimplifying the distinct roles, competitive dynamics, and regulatory considerations associated with each layer. Our rationale is as follows:

- a. **Distinct Market Dynamics:** Each component—operating system, app distribution, and browser/browser engine—operates within its own competitive and technical environment. For example, while the mobile operating system (OS) may be tightly integrated with the device, app distribution and browser choice can vary significantly across platforms and user preferences. Treating them as a single activity may obscure important differences in market power and user control.
- b. **Implications for Remedies and Oversight:** A bundled approach could limit the CMA’s ability to design targeted and proportionate remedies. For instance, concerns around app store fees or browser restrictions may require different regulatory responses than those related to NFC pricing and availability, operating system interoperability or security. Disaggregating these layers may allow for more nuanced and effective interventions.
- c. **Impact on Innovation and Security:** We are particularly mindful of the need to balance competition with platform integrity and security—especially in the context of financial services. A single-platform framing may underplay the legitimate technical and security justifications that platform providers use to manage these components differently.

- d. **User and Developer Experience:** From both a user and developer perspective, the boundaries between these components are meaningful. Developers interact with app stores and browser engines in ways that are distinct from their engagement with the OS. Similarly, users may switch browsers or app stores (where permitted) without changing their device or OS.

2.4 In summary, **while we acknowledge the interconnectedness of these digital activities, we believe that maintaining analytical separation between them is essential for a fair, effective, and proportionate assessment of market power, competitive constraints and effective remedial measures.**

**Question 3: Do you have views on our provisional finding that the competitive constraint on Google's mobile platform from Apple's and other rival mobile ecosystems is limited? This relates specifically to the competitive constraint in attracting:(i) end users, and (ii) content providers.**

3.1. We agree with the CMA's provisional finding that the competitive constraint on Google's mobile platform from Apple's and other rival mobile ecosystems is limited—particularly in the context of attracting users.

3.2. Our rationale for the lack of **competitive constraints for users** is as follows:

- **High Switching Costs for End Users:** From a consumer perspective, switching between Google/android and rival ecosystems (such as Apple) involves significant friction. This includes the cost of new hardware, loss of familiarity with the user interface, and potential incompatibility with previously purchased apps or services. These factors contribute to a high degree of user lock-in, limiting the competitive pressure Google faces.
- **Ecosystem Entrenchment:** Pairing and compatibility between mobile devices and wearables is achievable, and interoperability is technically possible across platforms. However, performance can be sub-optimal when devices from different ecosystems are used together. This can result in reduced functionality, limited feature access, or inconsistent user experience, which in turn may discourage consumers from mixing platforms and reinforce ecosystem lock-in.

3.3. In terms of **competitive constraints in attracting content providers we would note that it is a necessity for our business that we distribute on both Android and iOS. Our objective is to provide mobile banking services for all our customers. Android has fewer customers (and fewer higher value customers) than Apple but still constitutes a large, material customer base.** The existence of Apple (or other mobile ecosystems) is therefore not a competitive constraint on Android so long as material numbers of our customers continue to use Android devices. We would expect many other businesses that aim to provide mobile apps to face similar dynamics including businesses in sectors such as retail, airlines, tech and social media.

3.4. The strong, substantial position of Google's mobile ecosystems mean that we are dependent on it to ensure we can provide the financial services experience that our customers increasingly expect. Moreover, Google is readily able to leverage market power in mobile ecosystems to other activities/markets. Accordingly, there is a credible, material and reasonably foreseeable risk that healthy and fair competition is detrimentally impacted in a growing range of other connected markets and digital activities. It is therefore critical, through necessary intervention from the CMA and other regulators, that the competitive environment is nurtured and protected and, where necessary, restored in mobile ecosystems and other (potentially) impacted markets and activities. **In conclusion, we support the CMA's provisional finding on this point.**

**Question 4: Do you have views on our provisional finding that there are high barriers to entry and expansion for mobile platforms?**

4.1 We agree that there are significant barriers to entry and expansion for mobile platforms, and this applies to Android as much as to other ecosystems. While Android is often perceived as more open than iOS, the reality is that Google's control over key components—such as the Play Store, mobile operating system, and browser engine—creates structural limitations that are difficult for new entrants and competitors to overcome. Our rationale includes the following considerations:

- a. **Entrenched Ecosystem Effects:** From our perspective, distributing via the Play Store is not optional—it is a commercial imperative. The Play Store remains the dominant channel for app distribution on Android, and fragmentation across Android devices limits the viability of alternative stores.
- b. **Regulatory and Compliance Complexity:** For financial services providers like us, engaging with new platforms requires significant investment in security, compliance, and integration. The cost and risk associated with supporting additional platforms further entrenches the dominance of existing players and discourages experimentation with emerging alternatives.
- c. **Limited Commercial Incentives for OEMs and Developers:** The commercial incentives for device manufacturers and developers to support new platforms are limited, particularly when dominant platforms, such as Google, already offer scale, monetisation opportunities, and established user bases.
- d. **Brand Strength and Consumer Perception:** Google's brand attributes are reinforced through marketing and user experience, making it challenging for new platforms to gain traction—even if they were to offer comparable or superior technical capabilities. Users have formed the habit of downloading apps from the Play Store, and many would find doing so from other sources unnecessarily risky and counterintuitive.

**Individual parts of the platform also face high barriers to entry.**

4.2 Even large providers have failed to launch alternative propositions to Apple and Google's platforms. For example, Amazon and Huawei both attempted to persuade developers to publish their apps on the Amazon Appstore and Huawei AppGallery, respectively. Despite significant outreach efforts, they were largely unsuccessful, as developers felt the effort required to support these alternative platforms was not justified by the limited and uncertain commercial benefit. This illustrates the difficulty new entrants face in overcoming entrenched network effects and developer inertia in markets dominated by Apple and Google.

4.3 **Our own experience is deepest as it relates to digital wallets.** For this component of the platform there are **additional barriers: such as the ability (and incentive) for Google to self-preference in pre-installation of the wallet and self-preferencing in wider ecosystem integration.** In addition to these barriers Google has secured extensive merchant networks (with our promotional support) in e-commerce and with service providers in non-payment use cases.

4.4 **As a result, we are pessimistic as to any meaningful increase in competition or the benefits that would flow from it without targeted intervention from the CMA, specifically to address the problems with digital wallets as an activity.**

**We see significant costs to consumers and the economy from barriers to entry.**

4.5 Google's (and Apple's) substantial and entrenched position in the supply of wallets through their mobile ecosystem has already resulted in significant costs in payments markets which ultimately harms the UK economy, industry players and UK consumers, and this harm will continue to grow with the use of wallets. Excluding wallets from SMS designation risks missing a key area of harm flowing from Google's (and Apple's) substantial and entrenched

- and absence regulatory intervention, enduring market position in relation to mobile ecosystems and intrinsically linked activities.

4.6 The lack of competitive tension means that there is not a strong incentive for Google (or Apple) to invest in the broadest range of innovations and features, which would best serve consumers and support long-term UK growth. The lack of any diversity in providers also likely limits the scope and types of innovation. There is limited incentive to drive the adoption of new payment methods such as Open Banking as card payments are already monetised, and alternatives would (at best) be no different. There is also no incentive or competitive pressure to reduce the costs of providing wallets.

4.7 **We believe genuine competition would deliver a wider range of benefits, including greater innovation, lower costs, new payment types such as open banking, and more choice for consumers.** Given the wide-ranging potential of wallets, competition would also mitigate the risk that one or two firms have an entrenched position as key 'gatekeepers' to financial services and other digital products in the UK with all the anti-competitive incentives and consequences that flow from this.

4.8 If effective competition in digital wallets were enabled, we believe consumers and the UK economy would see significant and long-lasting benefits. Competition would:

- **Drive innovation** in features and user experience, such as account-to-account payments, budgeting tools, loyalty schemes, and rewards.
- **Support wider service integration**, including emerging services like Digital ID, which is likely to be a major source of customer and economic value.
- **Lower costs in payments** by reducing the charges banks face when customers use wallets, freeing up resources that can be focused on improving customer services and meeting customer needs (driving competition in the wider financial services sector).
- **Accelerate wallet adoption**, as competing providers promote their products through marketing, offers, and rewards, expanding the reach of more secure and convenient payment methods.
- **Ensure competitive access** to financial services and other products as wallets more and more represent a mainstream access method for customers.

4.9 **In summary, we believe the mobile platform market is characterised by high and persistent barriers to entry and expansion, which reinforces the market power of incumbents like Google and limits the scope for meaningful competition.**

**Question 5: Do you have views on our provisional finding that the competitive constraint on Google's mobile platform from: (i) alternatives to content distribution within Google's mobile ecosystem, and (ii) alternatives on non-mobile devices is limited?**

5.1 We agree with the CMA's provisional finding. While Google's platform is not as tightly controlled as Apple it still exhibits similar competitive constraints. These constraints are evident in the lack of success that other providers have had in launching rival propositions/app stores, including Amazon and Huawei.

5.2 Our rationale is as follows:



- a. **User Behaviour and Trust:** Users are conditioned to download apps through the Play Store and Google has generated a high level of trust in its curation and security standards. This behavioural norm further entrenches Google's control and makes it difficult for alternative distribution models to gain traction.
- b. **Non-Mobile Devices Are Not Substitutes:** For many consumers, mobile devices are the primary or sole means of accessing digital services. Desktop or laptop alternatives do not offer the same convenience, portability, or immediacy, and therefore we do not consider they exert meaningful competitive pressure on Google's mobile platform.
- c. **Impact on Content Providers:** Content providers, including financial institutions, must comply with Google's technical and commercial requirements to reach Android users. This includes adhering to Play Store policies, payment processing rules, and update cycles. The lack of viable alternatives limits negotiation leverage and reinforces Google's market power.

5.3 In summary, Google's control over content distribution within its mobile ecosystem, combined with the limited substitutability of non-mobile devices, results in a constrained competitive environment. We support the CMA's provisional finding on this issue.

**Question 6: Do you have views on our provisional conclusion that there are no expected or foreseeable developments that are likely (whether individually or in combination) to be sufficient in scope, timeliness and impact to eliminate Google's substantial market power in the provision of its mobile platform over the next five years?**

- 6.1 We agree with the CMA's provisional conclusion that there are no expected or foreseeable developments likely—whether individually or in combination—to be sufficient in scope, timeliness, and impact to eliminate Google's substantial market power in the provision of its mobile platform over the next five years. The only meaningful change we can envisage would come with the support of targeted regulatory intervention.
- 6.2 Our view is grounded in our experience as a major financial services provider operating within Google's mobile ecosystem per the reasoning we have previously set out in our submissions to the CMA.
- 6.3 The fact is Google's control over Android's core components—including the operating system, native app distribution via the Play Store, and the Chrome browser—remains entrenched. While Android is nominally open, the reality is that Google Play is indispensable for reaching users at scale. Our mobile apps are available only on iOS and Android and removing them from the Play Store would create significant barriers to customer access and engagement. Alternative stores such as Samsung Galaxy Store exist, but fragmentation across devices and limited user adoption make them commercially unviable.
- 6.4 Moreover, Google's ability to shape the ecosystem through default settings, pre-installed apps, and control over APIs reinforces its gatekeeping role. The technical and commercial burden of supporting multiple Android variants further limits the feasibility of new entrants or meaningful expansion by rivals. **We are pessimistic as to any market-led developments that would materially shift this dynamic. The most credible pathway to change lies in effective regulatory intervention—particularly through conduct requirements and pro-competition remedies that address structural barriers and ensure fair access.**

**Question 7: Do you have views on our provisional conclusion that Google has substantial and entrenched market power (SEMP) and a position of strategic significance (POSS) in respect of its mobile platform?**

7.1 We agree with the CMA's provisional conclusion that Google holds substantial and entrenched market power (SEMP) and a position of strategic significance (POSS) in respect of its mobile platform. Our rationale is as follows:

- a. **End-to-End Control of the Ecosystem:** Google exercises comprehensive control over its mobile ecosystem—from hardware and operating system to app distribution and payment infrastructure. This vertical integration allows Google to set the rules of engagement for both users and content providers, reinforcing its market power and limiting external influence.
- b. **Lack of Effective Substitutes:** For the majority of consumers, including those in the UK, Google's platform is not easily substitutable. The high switching costs, combined with the perceived superiority of Google's privacy, security, and user experience, contribute to sustained user loyalty and reduce the effectiveness of competitive alternatives. For consumer apps from companies with which the user didn't already have a relationship, the thought of searching for apps anywhere other than on the official Play Store would be virtually hypothetical.
- c. **Strategic Gatekeeper Role:** Google's control over the Play Store and its associated policies (e.g. in-app payment rules, app review processes, and data access restrictions) gives it a gatekeeper role that is strategically significant for content providers. For financial services firms like us, access to Android users is essential, and Google's terms and conditions directly affect how we deliver services and innovate on the platform.
- d. **Impact on Innovation:** We have not developed a standalone digital wallet on Android, due in part, to the structural barriers created by Google's entrenched market power, coupled with Apple's exclusionary conduct. The self-preferencing, such as the default positioning of Google Wallet, makes it extremely difficult to gain meaningful consumer traction. These conditions discourage investment and innovation by third-party providers, even those with established customer bases.
- e. **Entrenched Position Unlikely to Erode:** As outlined in our response to Question 6, we do not foresee any developments in the next five years that would materially challenge Google's entrenched position as far as distribution is concerned. Its market power is self-reinforcing, and its strategic significance is likely to persist absent regulatory intervention. It is likely that if other device types were to emerge and gain traction with users, Google's dominance would likely extend onto those as well.

**Question 8: Do you have any other views in relation to the assessment/evidence set out in the proposed decision?**

- 8.1 **We strongly support the CMA's proposal to designate Google with Strategic Market Status (SMS) and recognise the significance of this step in addressing entrenched market power in mobile ecosystems.** As the CMA is aware, we have consistently called for targeted regulatory action to address the structural barriers that limit competition—particularly in relation to digital wallets and access to NFC functionality. Google's strategic market position and approach to ecosystem control have significant implications for competition, innovation, and consumer choice within the UK mobile market. We support the CMA's efforts to investigate and address these concerns and urge the CMA to implement remedies that sensibly balance security and privacy concerns with the need to ensure fair and effective competition.
- 8.2 The CMA is uniquely positioned to promote competition in digital markets, following its new powers stemming from the Digital Markets, Competition and Consumers Act 2024. The FCA has stated that *"effective competition... helps create stronger firms and makes the UK an attractive market, supporting international competitiveness"*. We completely agree and encourage the CMA to take bold, forward-looking action that sets a global benchmark for digital market regulation.

- 8.3 We remain committed to working collaboratively with regulators, Google, and other stakeholders to build an open, secure, and innovative digital environment for all UK consumers.
- 8.4 In our view, Google's approach to ecosystem management frequently results in:
- **Limited availability of alternative app distribution channels;** and
  - **Tied services and default settings which advantage Google's own offerings.**
- 8.5 While we recognise the value of privacy, security, and user experience in Google's ecosystem, it is crucial that these are not used as a pretext for practices that stifle innovation, limit consumer choice, or undermine competition.
- 8.6 In addition, the open-source nature of the Android ecosystem—while beneficial for innovation—also introduces long-standing security challenges. The openness of the platform and the availability of technical information make it more susceptible to malware, viruses, and cyberattacks. This is not a theoretical concern; some of our customers have been victims of such vulnerabilities. While interoperability across devices is technically possible, performance and security can be compromised when pairing Android devices with wearables or services from other ecosystems. These risks further reinforce the need for regulatory oversight that ensures both competition and consumer protection.
- 8.7 Additionally, Google's ability to collect and leverage vast amounts of user data across its mobile ecosystems give it a significant commercial advantage. Through deep integration of hardware, software, and services, Google can track user behaviour, preferences, and interactions—enabling highly targeted and personalised marketing. This not only reinforces Google's market power by increasing monetisation opportunities but also raises serious privacy concerns. The extent of data collection and the opacity around how this data is used for commercial gain is troubling. We are particularly concerned about the implications for consumer trust and data protection, especially given the sensitive nature of financial services. Regulatory oversight is essential to ensure that data usage practices are transparent, proportionate, and aligned with consumer expectations and privacy standards.
- 8.8 We support interventions that uphold high standards of privacy and security, but which also ensure a level playing field for all market participants. Specifically, we recommend the following remedies are set out to better ensure fair and effective competition now and in the future:
- **Unbundling of Tied Services:** Users should have a genuine choice in default apps (e.g., payment, browser, email), with the ability to set third-party alternatives as defaults. These should be positioned as equivalent options, rather than alternatives that would require additional effort to set up.
  - **Regulatory Oversight:** to ensure that data usage practices are transparent, proportionate, and aligned with consumer expectations and privacy standards.
  - **Mandated Access to Core Device Capabilities:** Google should be required to provide third-party apps—on an objective and non-discriminatory basis—access to hardware features such as NFC, where security and user consent can be maintained.
  - **Alternative App Distribution:** The ability for consumers to install apps from sources other than from Google encourages innovation, provides alternative business models, and reduces single-gatekeeper bottlenecks: the CMA must look to ensure this ability is an ongoing reality.
  - **Greater Transparency and Accountability:** the CMA should design remedies that require Google to make its review and enforcement processes transparent, with clear service-level commitments for app reviews, appeals, and dispute resolution.
  - **Fair Commercial Terms:** Fees and terms should be subject to regulatory oversight to ensure they remain justifiable in principle and otherwise fair, reasonable, and non-discriminatory.

