



Vivaldi Technologies AS, Mølleparken 6, Oslo, Norway

Response to Proposed decision: SMS investigation into Apple's mobile platform

August 2025, prepared by [REDACTED]

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 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.

We currently have 3,500,000 active users world-wide.

Do you have any views on our proposed descriptions of the relevant digital activities, namely the smartphone operating system, the tablet operating system, native app distribution, and mobile browser and browser engine?

We largely agree, but suggest that the decision also explicitly mentions web apps in 3.1.3. Browser and Browser Engine, which currently reads:

“(d) Mobile Browser and Browser Engine, which we describe as the provision of a mobile browser and mobile browser engine, which comprises:

- (i) the provision of a software application that enables users of mobile devices to access and search the internet and interact with web content; and
- (ii) the provision of a mobile browser engine, which is the underlying technology which native apps on mobile devices use to transform web page source code into content with which users can engage”

As a browser maker, we understand that browsers are also “native apps” that are third-party software downloaded from Apple’s App Store, and which transform web page code into content. However, this could be misread as applying only to “in-app browsers”.

Additionally, this definition makes no reference to Progressive Web Applications, which are managed and rendered by a browser engine, but usually without the browser’s user interface being shown.

Given that the Proposed SMS decision and CMA’s previous Market Investigation Report both indicate concern that the Apple ecosystem is preventing innovative Progressive Web Applications from becoming widespread, we suggest that both 3.1.3(d)(i) and (ii) explicitly include reference to web applications (which are both “web content” and transformed by a mobile browser engine into content with which users can engage).

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 Apple’s mobile devices in order to allow users to access, view and engage with such content and services on their mobile devices?

We agree with the provisional conclusion; the ecosystem is what gives Apple its market dominance, rather than any individual component.

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

We agree with the provisional finding.

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

We agree with the provisional finding.

Do you have views on our provisional finding that the competitive constraint on Apple's mobile platform from alternatives to content distribution within Apple's mobile ecosystem, and alternatives on non-mobile devices is limited?

We agree with the provisional finding. Apple's control of their ecosystem has long prevented Progressive Web Apps from being an alternative way to write and distribute powerful Apps on iOS that can compete with the capabilities or "look and feel" of Native Apps on Apple's App Store.

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 Apple's substantial market power in the provision of its mobile platform over the next 5 years?

We agree with the provisional conclusion.

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

We agree with the provisional conclusion.

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

We are pleased that in the decision, CMA has identified interoperability with iOS services in 1.11(e):

"Apple restricts the features and functionality third-party app developers have access to within its iOS and iPadOS operating systems, in turn limiting the features and functionality third-party app developers can offer to consumers in their apps. This limits the development of innovative new services by app developers and provides Apple's own services with an advantage over those of third parties."

As with any web browser, Vivaldi is a third-party app. But we are unable to access the ability to add a website to home screen, which Apple reserves for itself in its system Share menu. Similarly, Vivaldi cannot provide functionality such as Web Bluetooth on iOS, even though other non-browser native apps can communicate through Bluetooth, due to our being unable to bundle our preferred browser engine in our iOS product.

We were similarly pleased to read that the CMA team recognises how the anti-competitive restrictions on alternative browser engines harm innovation. From 1.11(f):

In addition, Apple requires all browsers that wish to operate on iOS and iPadOS to use its browser engine WebKit, again limiting the features and functionality third-party browsers can offer. It is particularly important that this restriction does not hold back innovation in mobile browsing, for example for mobile browsers incorporating AI.

The WebKit restriction stifles the development of Progressive Web Apps, which is especially burdensome for small companies for whom developing and maintaining separate Native Apps for Android and iOS is expensive – while mature, cross-platform open Web Technologies are proven to work.

Apple has reportedly finished the technical work that allows non-WebKit browsers to ship in Europe in order to comply with the EU's Digital Markets Act.

We urge the CMA to prioritise measures that prevent Apple from requiring WebKit to be the engine in third-party browsers, and to prioritise measures to prevent Apple imposing onerous conditions on non-WebKit based browsers, or otherwise circumventing such measures; and to require that any such browsers have access to all APIs on iOS that Native Apps (including Apple's own Native Apps) can access - including adding to home screen, accessing Bluetooth, NFC, etcetera.

ENDS