Consultation: Data Portability Conduct Requirement

Google's general search services

28 January 2026

Contents

1. Introduction

1.1 This consultation document sets out our proposals for a CR to give consumers who use Google's general search services the right to port their data directly to other businesses (**Data Portability CR**). The proposed CR would allow consumers to share the value of their data, and would allow third party developers, with users' consent, to use this data to develop new products, enhance existing product features or to facilitate switching from, or multi-homing with, Google products.[1] We include the following:

(a) Section 2: Aim of our Data Portability CR

(b) Section 3: Proposed Data Portability CR and Interpretative Notes

(c) Section 4: Effectiveness of our Data Portability CR

(d) Section 5: Provisional proportionality assessment for the Data Portability CR; and

(e) Section 6: Questions for consultation.

1.2 Within the European Economic Area (**EEA**), the DMA[2] requires Google to allow end users to port their data from designated core platform services, including Google Search.[3] Google complies with the DMA through a combination of Google Takeout[4] and a new tool introduced in March 2024, the data portability API (the **API**).[5] The API enables end users to provide authorised third parties with direct access to data from a variety of Google

[1] Google, Data Portability API Overview | Google for Developers, accessed by the CMA on 17 December 2025.
[2] The DMA establishes a set of clearly defined objective criteria to identify 'gatekeepers'. Gatekeepers are large digital platforms providing so-called core platform services, such as for example online search engines, app stores, messenger services. Gatekeepers have to comply with specific obligations and prohibitions listed in the DMA: European Commission, The Digital Markets Act, accessed by the CMA on 16 December 2025.
[3] Article 6(9) of the DMA.
[4] Google Takeout allows end users to download a copy of their data held across Google products to their own device, to export it to a cloud storage service to back it up or to upload it to another service: Google, How to download your Google data, accessed by the CMA on 27 November 2025. We have not identified any concerns with the operation of Takeout within the UK. Our proposed CR focuses instead of the porting of data through authorised third parties.
[5] Alphabet, EU Digital Markets Act (EU DMA) Compliance Report Non-Confidential Summary, 7 March 2025, accessed by the CMA on 27 Nov 2025 (paragraph 43, page 30).

products and services.[6] The DMA's requirements do not extend to UK users but Google provides the API in the UK voluntarily.[7]

1.3 In the first year of the API's availability in the EEA, Google received [less than 20] requests from businesses to use the API.[8] As of August 2025, these businesses together served around [200,000-250,000] users of the API in the UK. This represents significant growth from the [0-1,000] users in the UK in February 2025.[9]

1.4 Embedding data portability for search data within a CR should allay concerns that Google's existing voluntary tool may be discontinued or degraded and drive increased investment in innovative data-driven services. The drafting of our proposed CR can be found in Section 3 below. For more information about the digital markets competition regime, Google's designation with SMS in general search and the process for considering CRs, see the 'Introduction to the consultation' document published separately.

Concerns we have heard about Google's data portability API

1.5 Stakeholders told us that Google's API outperforms those implemented by other DMA gatekeepers, and that Google is more willing than other gatekeepers to engage with stakeholders and make improvements.[10]

1.6 Stakeholders, however, raised two main concerns with the voluntary nature of implementation of the API in the UK, focussing on operational uncertainty and various aspects of the technical implementation and service levels provided by Google.

Operational uncertainty

1.7 A number of stakeholders highlighted that, because the API is not mandated by law in the UK, it could be withdrawn at any time and that providing greater legal certainty would reduce barriers to investing in applications requiring data

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[6] Google, Google Account Help, Share a copy of your data with a third party - Google Account Help, accessed by the CMA on 6 October 2025; Google, Data Portability API | Google for Developers, accessed by the CMA on 17 December 2025.
[7] Google, Google Account Help, Share a copy of your data with a third party - Google Account Help, Common Questions, "Where is this feature available?", accessed by the CMA on 6 October 2025.
[8] Google's response to the CMA's RFI.
[9] Google's response to the CMA's RFI.
[10] CODE's response to the CMA's RFI; Note of meeting with [✂].

provided through the API.[11] [A startup] explained that this would increase the viability of their business model in the eyes of investors, leading to lower cost of capital.[12] Gener8 said that the current lack of a legal requirement was 'a real existential risk.'[13]

1.8 Furthermore, several stakeholders highlighted the importance of alignment of a UK data portability solution with that offered in the EEA.[14] [A startup] commented that 'a UK instrument aligned to Article 6(9) signals that [the] UK scope will not regress below the EU baseline, which directly reduces perceived business risk because investors do not like to fund businesses with extreme legal uncertainty.'[15] [The startup] also told us that alignment would enable them to re-use their existing implementation (authorisation flows, storage, compliance controls).[16] We were told by CODE, a trade association representing several users of the API,[17] that they 'would prefer a sub-par solution working in more geographies than a perfect solution in the UK only.'[18]

Operational shortcomings

1.9 Third party businesses which use the API identified some shortcomings in their experience of its current implementation. We received mixed evidence on these issues.

Security verification

1.10 Third parties must obtain Cloud Application Security Assessment (**CASA**) verification to obtain access to restricted scopes,[19] including Google search

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[11] CODE's response to CMA's roadmap of possible measures to improve competition in search; Gener8's response to CMA's roadmap of possible measures to improve competition in search; Note of call with Gener8; Datapods' response to CMA's RFI; [✂] response to the CMA's RFI; [an SME's] response to the CMA's RFI; [✂] response to the CMA's RFI.
[12] [A startup's] response to the CMA's RFI.
[13] Note of call with Gener8.
[14] [An SME's] response to the CMA's RFI. Note of call with [✂]. Note of call with CODE. Note of call with Gener8. Datapods' response to the CMA's RFI.
[15] [A startup's] response to the CMA's RFI.
[16] [A startup's] response to the CMA's RFI.
[17] CODE website (https://www.codepolicy.org/), accessed by the CMA on 17 December 2025.
[18] Note of call with CODE.
[19] Restricted scopes grant access to highly-sensitive or extensive user data or actions and require security assessment: Google, Configure the OAuth consent screen and choose scopes | Google Workspace | Google for Developers, accessed by the CMA on 17 December 2025.

activity,[20] in the API.[21] This involves a risk-based assessment of storage integrations that is performed and awarded by approved third-party firms,[22] and paid for by the third-party developer.

1.11 CODE and some of its members have said that the CASA is expensive (at around $1000) and not fit for purpose,[23] although another considered the price reasonable.[24] Google said that completing a security assessment is only required for apps seeking access to 'Restricted Scopes' and is a standard requirement for all Google APIs.[25] The CASA is built on industry-recognised standards of the OWASP's Application Security Verification Standard[26] and accreditation is administered by third parties, which set their pricing independently. For example, TAC Security offers CASA assessments at different price points starting at $540.[27]

Operational predictability, reliability and scalability

1.12 CODE identified a range of issues with the API's performance and functionality on behalf of their members. We heard that access was unpredictable, with download speeds varying drastically (seconds to 24 hours); that some data exports just 'do not work' for reasons the developer cannot ascertain; and that restrictive rate limits undermined scalability.[28]

1.13 Google submitted that these concerns were at odds with evidence on the performance of the API, as well as with feedback received by Google from developers during the launch of the API.[29] It noted that, in its 2025 DMA Compliance Report, each of its 'output metrics' for the period March-

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[20] Google, Restricted Scopes - Google Cloud Platform Console Help, accessed by the CMA on 10 December 2025.
[21] Google, Security Assessment - Google Cloud Platform Console Help, accessed by the CMA on 10 December 2025. The security verification process is described in Data Portability API Overview | Google for Developers, step 5, accessed by the CMA on 10 December 2025.
[22] https://appdefensealliance.dev/casa accessed by the CMA on 19 August 2025.
[23] Note of meeting with CODE; [✂] and [✂] referenced in CODE's submission to the CMA.
[24] Note of meeting with Gener8.
[25] Google, Security Assessment - Google Cloud Platform Console Help, accessed by the CMA on 18 December 2025. Google's response to the CMA's RFI.
[26] OWASP Foundation, OWASP Application Security Verification Standard (ASVS), accessed by the CMA on 18 December 2025. Open Worldwide Application Security Project (**OWASP**) is a nonprofit foundation that works to improve the security of software.
[27] TAC Security, Google CASA Partner Cloud Application Security Assessment, TAC Security, accessed by the CMA on 18 December 2025.
[28] CODE's submission to the CMA.
[29] Google's response to the CMA's RFI.

November 2024 showed very high success rates.[30] Google explained that it monitors performance of the API internally to ensure it is maintained at a high level.[31]

Support

1.14 We were told by CODE that, despite some responsiveness from Google, many bug reports and support tickets are ignored, and developers lack visibility into issue resolution timelines.[32] We also heard, however, from a current user of the API that Google is doing a 'great job' and that they 'have received consistent support from the team.'[33]

1.15 Google provides access to an issues tracker which enables users of the API to raise issues which Google assigns for resolution.[34] Google noted that, as of September 2025, the issues tracker only contains six open issues, none of which predates June 2025, and all of which are feature suggestions, not malfunctions.[35]

Consent flows

1.16 When users seek to transfer their data through the API, they are presented with a series of consent screens confirming that they wish to proceed and emphasising the importance of data security.

1.17 Several stakeholders commented on these screens, suggesting that:

(a) they are 'long,' 'scary,' and 'cluttered' and include extra steps after the user has expressed interest in consenting on the third party's portal;[36]

(b) the developer cannot see for what period a user has provided consent, which prevents them from being able to communicate with users at relevant times to prompt renewal of access;[37] and

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[30] Google's response to the CMA's RFI. This includes markers such as the number of requests successfully served by the API and the percentage of exports completing in less than 24 hours.
[31] Google's response to the CMA's RFI.
[32] CODE's submission to the CMA.
[33] [A startup's] response to the CMA's RFI.
[34] Google, IssueTracker, accessed by the CMA on 6 November 2025.
[35] Google's response to the CMA's RFI.
[36] CODE's submission to the CMA. The screens were also described by [one CODE member] as a 'novel and maybe scary experience': CODE's submission to the CMA.
[37] CODE's submission to the CMA.

(c) user drop-out rates during interaction with these screens range from around 30%[38] to over 70%[39] and 'encourage user churn.'[40] [A startup] noted that drop off was clustered most heavily at the Google consent stages and suspected the orange warning message that Google presents in the user flow is a major factor, together with the several checkboxes the user needs to select to grant access in the last screen of the consent.[41]

1.18 Google has explained that it went through a considered design process in shaping its consent flow and that the flow is longer for the first authorisation a user makes, but is much simpler if they give repeated consent to the same developer for the same type of access.[42] Google also reiterated the importance of striking a balance between data privacy and user understanding and ease of portability. Google noted that, during the development of the API, several stakeholders emphasised data security and the importance of obtaining fully informed consent for data transfers.[43]

Service level requirement

1.19 To address the shortcomings identified, some stakeholders called for any CR to impose a service level requirement (**SLR**).[44] Some of these suggested there should be meaningful penalties for non-compliance.[45] Stakeholders consider that a formal SLR would improve opening up data access,[46] and ensure dependable infrastructure.[47] Data Transfer Initiative commented that the requirements under Article 6(9) of the DMA were not sufficiently clear in

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[38] [One stakeholder] submitted that 29% of users who start the data portability API flow from their apps abandon the process: [✂], CODE's submission to the CMA. [Another stakeholder] also noted a 30% drop-off from a user deciding to give permission to export their data and clicking the first button, to this permission being granted, CODE's submission to the CMA.

[39] [A startup's] response to the CMA's RFI. This mentioned two experiments. In one experiment, users were asked to share their Google data in exchange for [monetary incentives]. Of the 233 users who were shown the offer, 189 (81%) opted to "continue", but only 47 (20%) actually granted authorisation/consent to share their data for a certain duration. In another experiment: 932 end users were presented with a similar offer. Of those 822 (88%) opted to 'continue', but only 238 (25%) managed to complete the consent flow and granted authorisation/consent to share their data for a certain duration.

[40] CODE's submission to the CMA. [A startup] mentioned two experiments that point to a 75% and 71% drop-out rate: [A startup's] response to the CMA's RFI.

[41] [A startup's] response to the CMA's RFI.

[42] Google's response to the CMA's RFI.

[43] Google's response to the CMA's RFI.

[44] [✂] response to the CMA's RFI; [a startup's] response to the CMA's RFI; [✂] response to the CMA's RFI.

[45] [✂] responses to the CMA's RFI; [a startup's] response to the CMA's RFI.

[46] [✂] response to the CMA's RFI.

[47] [A startup's] response to the CMA's RFI.

advance of implementation to plan a business around, or at least not certain enough to attract investment.[48]

1.20 Google did not see a material need for an SLR given that Google monitors all industry standard service level indicators in relation to the API to ensure the availability of the service and Google's compliance with the DMA. It submitted that it has neither the incentive, nor the ability, to degrade the performance of the API for UK users for a number of reasons: that it would damage Google's reputation; it would degrade the entire API (exposing Google to enforcement for DMA non-compliance); and [✂].[49]

Our assessment of concerns

1.21 Based on the evidence presented, we provisionally consider that the current absence of a formal requirement on Google to provide data portability in the UK creates business and investment uncertainty. We acknowledge that Google operates the API in the UK on a voluntary basis and may continue to do so. However, a voluntary API is inherently uncertain, and based on the submissions we received, our provisional assessment is that this uncertainty risks negatively impacting investment decisions, and therefore growth and innovation. We therefore propose a Data Portability CR that would create greater certainty that the API will continue to operate in the UK.

1.22 On balance, the cost of security verification appears justified to ensure third parties meet industry standards, provided Google makes no financial gain and satisfies other conditions which we propose to set out in Interpretative Notes.[50]

1.23 We do not currently see sufficiently clear evidence of significant shortcomings in terms of the predictability, reliability, and scalability of the API or support provided to include an SLR as part of the Data Portability CR (see also paragraphs 4.14ff below). However, we propose to set out clear expectations in the Interpretative Notes and to monitor Google's conduct and relevant metrics (see paragraphs 4.18ff below).

1.24 We do not propose to require changes to the design of the consent flow at this stage (but propose to keep this under review as part of our monitoring of the Data Portability CR). An appropriate amount of friction appears reasonable to

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[48] Note of meeting with Data Transfer Initiative.
[49] Google's response to the CMA's RFI.
[50] We have not undertaken a detailed assessment of the CASA verification compared to other forms of verification.

encourage users to engage in an informed manner before deciding to share their personal data.[51] Reported dropout rates varied significantly, suggesting that dropout rates may be attributable, at least in part, to other reasons (such as users' varying attitudes towards individual apps or their understanding of the potential risks).

[51] DRCF, Harmful design in digital markets: How Online Choice Architecture practices can undermine consumer choice and control over personal information, page 16.

2. Aim of our Data Portability CR

2.1 Taking into account the nature of the concerns set out in section 1 above, our aim for our intervention is to ensure that UK consumers who use Google's general search services can effectively port their data to other businesses to develop new services or otherwise share the value of that data.

Statutory objective(s)

2.2 As explained in the 'Introduction to the consultation' document, the Act provides that CRs must seek to achieve one or more of three statutory objectives.[52]

2.3 The Data Portability CR would pursue the fair dealing statutory objective (set out in section 19(6) of the Act). By empowering end users of Google's general search services[53] to access and port their data to other businesses in line with their preferences, the Data Portability CR would seek to ensure that end users of Google's general search services are treated fairly and are able to interact, whether directly or indirectly, with Google on reasonable terms.

Permitted type(s)

2.4 As explained in the 'Introduction to the consultation' document, each CR must fall within an exhaustive list of 'permitted types' set out in the Act.[54]

2.5 The proposed Data Portability CR would fall under the permitted type set out in section 20(3)(h) of the Act. It would be for the purpose of preventing Google from restricting the ability of users or potential users to use products of other undertakings.

Consumer benefits likely to result from this CR

2.6 Before imposing a CR, the CMA must have regard in particular to the benefits for consumers that it considers would likely result from the CR.[55]

2.7 Imposing a Data Portability CR would provide a range of benefits to consumers. For example, it would directly benefit those consumers who

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[52] Section 19(5) of the Act.
[53] As users or potential users of the digital activity, where these terms have broad meanings: see section 118(1) and (2) of the Act and the explanatory notes to the Act, paragraph 533(f) and (g).
[54] Sections 19(9) and 20 of the Act.
[55] Section 19(10) of the Act.

actively want to transfer their data between different services, or to use a third-party product and a Google product simultaneously,[56] and it would indirectly benefit all consumers by helping businesses to get more data and improve the services they can offer.

2.8 The Data Portability CR would also potentially incentivise third parties to improve existing, or develop new, products because of their additional confidence in the availability of data valuable to such products. We have received some evidence from stakeholders that this might include supporting third party general search services[57] and AI assistants.[58]

2.9 The benefits would also arise in both the short term and the longer term. For example, in the short term the CR would lead to better services for consumers in markets that already exist; longer-term, there could also be a positive impact on investment and innovation in new services and the creation of new markets which benefit consumers.

2.10 The potential benefits from the proposed CR are discussed further below where we assess proportionality.

[56] Google, Data Portability API Overview | Google for Developers, accessed by the CMA on 19 January 2026.
[57] For example, [✂]. [✂] response to the CMA's RFI.
[58] [✂] response to the CMA's RFI; [✂] response to the CMA's RFI; [✂] response to the CMA's RFI.

3. Our proposed Data Portability CR and Interpretative Notes

Proposed CR

3.1 Having identified our aim (see paragraph 2.1) based on the concerns identified in section 1, we are proposing to impose the following draft Data Portability CR on the basis of the effectiveness and proportionality analysis set out in sections 4 and 5 below respectively.

1. For the purposes of this conduct requirement:
   - **a. Digital Markets Act** means Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828;
   - **b. DMA Data Portability API** means the application programming interface established by Google to meet its obligations under Article 6(9) of the Digital Markets Act, as amended from time to time;
   - **c. General Search Services** has the meaning given to it in the SMS Decision Notice dated 10 October 2025, as revised from time to time;
   - d. **Specified Data** means data provided by the UK End User or generated through the activity of the UK End User in the context of the use of Google's General Search Services as a signed-in user where such data also falls within the scope of Google's obligations under Article 6(9) of the Digital Markets Act, as revised or amended from time to time;
   - e. **UK End User** means any natural or legal person located in the UK using Google's General Search Services, other than as a business user.

2. Google shall provide third parties authorised by a UK End User, at their request and free of charge, with tools to facilitate the effective portability of Specified Data.

3. Google may comply with its obligations under this conduct requirement by making its DMA Data Portability API available in relation to UK End Users on the same terms and to the same standard as within the European Economic Area.

Proposed Interpretative Notes

3.2 The CMA may publish Interpretative Notes to accompany a CR. Interpretative Notes will provide greater clarity over the CMA's interpretation of a CR, including how it may apply in particular circumstances for the benefit of both the SMS firm and other industry participants.[59] It would be open to the SMS firm to take a different approach to the one outlined in the Interpretative Notes where it is able to demonstrate to the CMA that its approach complies with the terms of the CR.[60]

3.3 We propose that the Data Portability CR be accompanied by the following set of interpretative notes.

1. The CMA would expect Specified Data to include both:
   (a) data that a UK End User provides directly through their use of Google's General Search Services; and
   (b) data that a UK End User provides and consents to be used by Google in the context of personalising its General Search Services.

2. This conduct requirement does not require Google to provide data portability in relation to any sets of user data that fall outside of its obligations under Article 6(9) of the Digital Markets Act, as amended from time to time.

3. In order for Google's data portability tools to be effective for the purposes of this conduct requirement, the CMA would expect Google to:
   (a) use all reasonable endeavours to:
      (i) maximise any data portability tool's uptime;
      (ii) ensure that data transfers under any data portability tools are successful;
      (iii) ensure that data ported under any data portability tool is complete, accurate and sufficient to enable any authorised third party to match it with the UK End User;
   (b) provide sufficient capacity to allow authorised third parties to access data at a frequency to meet their reasonable business needs;
   (c) provide appropriate and understandable error messages to authorised third parties if they are denied access to the underlying data. This should be provided at the time access is denied and include the reason for the denial of access. Google should be able to demonstrate that its error

[59] See Digital Markets Competition Regime Guidance (CMA194), paragraphs 3.59 to 3.60.
[60] See Digital Markets Competition Regime Guidance (CMA194), paragraph 3.61.

reporting is appropriate by reference to appropriate benchmarking of industry standard practice for equivalent services;

(d) maintain its existing issues tracker or provide an alternative, sufficiently resourced, channel that enables authorised third parties to report issues;

(e) address issues identified through the issues tracker or alternative channel established under the above paragraph as quickly as practicable;

(f) give sufficient notice to authorised third parties and UK End Users of any material changes to the data portability tools;

(g) ensure that UK End Users are presented with balanced, understandable and targeted choices across all data portability tools and, whilst recognising that data portability is itself an important data protection right, that consent flows appropriately balance the ease of data portability with appropriate privacy and security considerations;

(h) ensure that, if requiring third-party applicants to undergo an approval and verification process to establish that they have adequate security arrangements in place to protect user data before accessing data portability tools:

(i) any verification process can be undertaken in a timely and effective manner and Google does not impose unreasonable requirements on any third-party applicant or require payment of administrative or any other costs. Verification may be conducted by an external provider and may require a third-party applicant to make a payment to such an external provider for the verification process; and

(ii) approval to use the data portability tools provided by Google, such as the DMA Data Portability API, is not conditional on any restrictions on the use of the data by the third-party applicant, and this is clearly communicated.

4. Effectiveness of our proposed Data Portability CR

4.1 Having identified an aim (see paragraph 2.1 above) the CMA must identify a CR, or combination of CRs, that would likely be effective in achieving this aim. As part of this, the CMA will consider both the content and form of potential CRs.[61]

4.2 Overall, we consider that the most effective approach to meet our aim is through a CR that puts Google under a legal obligation to provide data portability to UK users, on a basis that maximises consistency with Google's existing API under the DMA. This would give businesses the certainty that they need to invest and innovate.

4.3 This section sets out the analysis we have undertaken to identify the most effective detailed design of a CR. It focuses on the following issues in turn:

(a) The key design issues we have considered.

(b) Implementation and compliance considerations.

Key design issues we have considered

4.4 In designing our proposed Data Portability CR, we considered the following design issues:

(a) the effective range of users for the CR;

(b) the effective data scope for the CR; and

(c) how to ensure effective service levels.

The effective range of users for the CR

4.5 Google has explained that for developers to use its API in the EEA, end users can authenticate and authorise access for third-party developers using their Google accounts. The data that is portable via the API covers end user data that is provided or generated by a user engaging with Google's user-facing core platform services, while signed-in to their Google account.[62]

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[61] See Digital Markets Competition Regime Guidance (CMA194), paragraph 3.20(b).
[62] Google's EU DMA Compliance Report Non-Confidential Summary dated 7 March 2025, page 25, paragraph 24(c), NCV of Compliance Report 2025.

4.6 We consider that it is effective in order to achieve the aim of the CR to require Google to offer data portability to UK users on the same basis, ie to signed-in UK users of Google's general search services.

The effective data scope for the CR

4.7 We understand that signed-in users provide and generate a range of data in the context of using Google's general search services. Google provides a range of privacy controls to end users, regardless of whether they are signed into their account or not.[63] Data and privacy controls in end users' Google accounts include:

(a) Data and privacy controls which allow signed-in end users to control the processing of data (including for personalised ads and search personalisation); and

(b) 'Activity Controls', which allow signed-in users to determine settings for personalisation within and across end user-facing services based on data.[64]

4.8 For those users who consent, Google Search can show personalised experiences based on data saved in their Google account.[65]

4.9 Users therefore can provide or generate data in the context of their use of Google's general search services by:[66]

(a) Entering or generating data when using Google's general search services directly;[67] and

(b) Giving consent for Google to use data collected from that user across Google's other services and products to personalise their general search or search advertising results.

4.10 In principle, we consider that a data portability CR could extend to all data provided by the end user, or generated through the activity of the end user, in the context of using Google's general search services, as set out in the two

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[63] Google Account, Data & privacy, accessed by CMA on 20 November 2025.
[64] Google's response to the CMA's RFI.
[65] Google Account, Data & privacy, accessed by CMA on 3 December 2025.
[66] In the scheme of the Act, 'using' includes interacting, or carrying out activities that interact, in any way, directly or indirectly, with the service or digital content (s118(2)(b)).
[67] For example, entering queries or generating search results on google.com or the Google Search app.

categories above. This could in principle encompass data not currently provided under Google's existing API.[68]

4.11 However, requiring Google to amend the scope of the API in the UK only would have significant cost implications for Google (see paragraph 5.8 below). We consider that the most effective data scope would be the data provided by the end user, or generated through the activity of the end user, in the context of using Google's general search services – where such data also falls within the data required to be provided under Article 6(9) of the DMA.

4.12 By way of context, most of the commonly utilised data scopes under the existing API in the UK are used to personalise results in Google's general search, including the four most utilised data scopes from the API currently provided voluntarily in the UK: [✂].[69]

4.13 Our proposed scope would enable UK end users to port a range of their data to third parties while providing businesses with legal certainty over the continued availability of that range of data for them to continue to innovate, to the benefit of UK end users. It would also avoid the disbenefits inherent with a different data scope discussed further in paragraphs 5.6ff below (limb 3 of the proportionality test).

How to maintain effective service levels

4.14 We have considered whether to impose an SLR as part of the Data Portability CR itself. Our guidance provides that a detailed CR may be appropriate where a firm 'has failed to comply effectively with higher-level requirements and/or in circumstances where the CMA has identified clear and persistent existing issues which need to be corrected'.[70] At this stage, we have not identified clear evidence of either of these.[71] In addition, the inclusion of specific requirements in the Data Portability CR creates risks of misalignment between the technical functioning of Google's API in the UK and the EEA.

4.15 We do not at this stage propose to specify detailed obligations as part of a Data Portability CR. We propose instead to clarify our expectations in the

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[68] A small number of submissions argued that the Data Portability CR should also cover additional data sources beyond those provided under the DMA. In particular, this applied to Gemini AI assistant data (three developers: Gener8, [✂] and [a startup]), Gmail data (one developer: Gener8), and Google Ads data beyond that included within the MyAdsCentre scope (one trade association: CODE). Sources: Note of meeting with Gener8; CODE submission to the CMA; [✂] response to the CMA's RFI; [a startup's] submission to the CMA.

[69] Google's response to the CMA's RFI. Google's response to the CMA's RFI.

[70] CMA194, paragraph 3.29(d).

[71] See paragraphs 1.19 to 1.20 and 1.23 above.

Interpretative Notes and to monitor compliance through ongoing dialogue with key stakeholders and Google and through the regular reporting of key metrics. We will keep this approach under review.

Implementation and compliance

4.16 A CR comes into force at a time determined by the CMA.[72] Once in force, Google would be required to provide the CMA with a compliance report in relation to that CR[73] and the CMA would be required to keep under review the extent to which Google is complying with the CR.[74] This section sets out our proposed approach to ensure the Data Portability CR is implemented effectively and to monitoring compliance.

Implementation

4.17 Given that the API is already in place in the EEA and (voluntarily) in the UK, we would expect Google to be fully compliant with a CR no later than three months after it is imposed.

Compliance

4.18 We would monitor compliance through three main mechanisms: ongoing stakeholder engagement and feedback; reporting of key metrics from Google; and an annual compliance report from Google.

4.19 Google's annual compliance report would include an explanation of how it has complied with the CR over the relevant period and state any changes in its provision since the previous report. Google already provides compliance reporting on its API to the European Commission, so we expect Google to be able to meet a CMA reporting requirement without difficulty.

4.20 Beyond this reporting, we would maintain regular communication with stakeholders on this CR, including businesses that use the API. This would enable them to raise issues with us if they believe Google is failing to comply with the requirement.

4.21 As part of compliance reporting, we propose to monitor the effectiveness of Google's solution, as the Data Portability CR will require Google to provide *effective* data portability. We propose to monitor this element of the

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[72] Section 19(11)(a) of the Act.
[73] Section 84(1) of the Act.
[74] Section 25(b) of the Act.

requirement by collecting information and data from Google and other stakeholders.

4.22 We propose to require Google to supply the following metrics in each compliance report, each in relation to UK-based usage of the data portability solution during the reporting period, broken down by month:

(a) The percentage of successfully served requests via the API;

(b) The percentage of data exports made via the API that completed within 24 hours;

(c) The percentage of files successfully exported in completed requests via the data portability API;

(d) The percentage of uptime of the API in each 24-hour window; and

(e) The number of users who initiated an export via the API.

4.23 In addition, compliance reports should highlight any changes that have been made to the API in the reporting period.

4.24 Google already provides some of these metrics to the European Commission for DMA compliance monitoring purposes.[75] These requirements are therefore expected to create little additional burden on Google.

4.25 In the interest of transparency, the CMA considers that Google should prepare a non-confidential version (alongside the confidential version) of each compliance report and related performance metrics and publish this at the same time as submitting it to the CMA. This would improve confidence in Google's provision of the API and enable third parties to provide further views on Google's compliance.

[75] Google's response to the CMA's RFI.

5. Provisional proportionality assessment for the Data Portability CR

5.1 The CMA may only impose a CR if it considers that it would be proportionate to do so for the purposes of one or more of the statutory objectives, having regard to what the CR is intended to achieve (as set out in paragraph 2.1 above).[76]

5.2 This section sets out our provisional proportionality assessment of our proposed Data Portability CR, considering each of the four limbs of the proportionality assessment in turn as envisaged in our guidance.[77] A proportionate CR is one that:

(a) Is effective in achieving its intended aim;

(b) Is no more onerous than it needs to be to achieve its intended aim;

(c) Is the least onerous CR, where the CMA has identified multiple equally effective options that would achieve the intended aim; and

(d) Does not produce disadvantages that are disproportionate to its aim.[78]

The CR is effective at achieving its intended aim

5.3 As set out in the 'effectiveness' analysis above, based on our engagement with stakeholders, we consider that the proposed Data Portability CR would be effective in achieving the aim, by ensuring that UK users of Google's general search services can effectively port their data to other businesses which may use it to develop new services or share the value of that data with UK consumers.

The CR is no more onerous than necessary

5.4 We considered two areas: a mandated SLR and scope.

SLR

5.5 As noted above, we have considered an alternative approach whereby we include more detailed requirements on the face of the CR. We do not currently

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[76] Section 19(5) of the Act.
[77] CMA194, paragraph 3.33.
[78] CMA194, paragraph 3.33.

consider that this would be more effective, and it would be more costly for Google to comply with. It could also lead to divergence between the CR in the UK and the API as offered in the EEA, which stakeholders told us would be a negative result.

The data scope of the CR is no more onerous than necessary

5.6 As set out in paragraph 4.10, data provided by, or generated through the activity of, the end user in the context of the use of Google's general search services could in principle encompass data not currently provided under Google's existing API.

5.7 However, we consider that the most effective data scope would be the data provided by the end user, or generated through the activity of the end user, in the context of using Google's general search services – where such data also falls within the data required to be provided under Article 6(9) of the DMA.

5.8 This scope ensures that our proposed CR is no more onerous than necessary. Our assessment of Google's submissions implies that an expanded data scope would materially increase costs.[79] It would also reduce third-party disbenefits and costs associated with a scope which would diverge from that offered under the DMA, outlined in the stakeholder evidence in paragraph 1.8.[80]

The CR is the least onerous, where the CMA has identified multiple equally effective measures

5.9 We have not identified any other equally effective measures.

The CR does not produce disadvantages which are disproportionate to the aim

5.10 We understand that Google would be most likely to comply with our proposed CR through the existing API (and that the existing API would be the least

[79] These costs include multiple separate compliance burdens; engineering costs to integrate additional data sources, provide parallel authorisation mechanisms for UK and DMA compliance, build a new user interface and related components, and costs of investigating and address privacy and transparency concerns. Google's response to the CMA's RFI.

[80] Google also submitted that third parties would incur additional costs through having to maintain two different authorisation and data management solutions across UK/EEA users. Google's response to the CMA's RFI.

costly way for Google to comply), therefore we have assessed the proportionality of the Data Portability CR on that basis below.[81]

5.11 In this section, we therefore assess costs and benefits against a scenario where Google continues to provide the API *voluntarily* in the UK, even absent intervention (though this future provision would not be certain).[82] On the basis of Google's submissions, we consider this to represent the most likely and thus appropriate alternative scenario.[83]

5.12 Google's voluntary future maintenance of the API in the UK is however not the only possible alternative scenario. Below, we therefore test the sensitivity of our main estimates in this section to a second alternative scenario in which the API were withdrawn from the UK.[84]

Potential costs

5.13 Google submitted that the incremental costs of formalising the API are likely to be negligible, given Google already voluntarily provides the API.[85] Google submits that it will also potentially incur compliance costs, as well as potential costs from third-party enforcement.[86, 87] Based on Google's estimates of costs for other interventions and an illustrative calculation, we believe these costs are unlikely to be greater than [up to £1] million a year.[88]

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[81] All cost and benefit figures are real and undiscounted, unless stated otherwise.
[82] In this sense, we are effectively assessing the benefits arising from the certainty that Google will continue to provide the API and will not in any way downgrade its quality.
[83] Google's response to the CMA's RFI.
[84] We find that such an alternative would deliver greater benefits than in the main alternative scenario (which we set in the potential benefits section). Primarily as in this second alternative, there are more additional users benefiting due to our intervention as in this scenario there is no voluntary API user base. However, this scenario does also result in additional costs (see potential costs below), but these are still far smaller than the benefits. In fact, the benefits in the primary alternative still exceed the increased costs in the second alternative scenario.
[85] Google's response to the CMA's RFI; Google's response to the CMA's RFI.
[86] Google's response to the CMA's RFI.
[87] In our second alternative scenario, Google submitted that it would need to reintroduce the existing EEA Data Portability API, and as such would face incremental one-off set up costs [of up to £1 million]. Google also submitted that it would incur ongoing and monitoring costs [of up to £2 million] a year. See Google's response to the CMA's RFI; Google's response to the CMA's RFI.
[88] This is consistent with Google's estimate of 'ongoing costs', in particular 'those associated with supporting engineers on updating compliance systems, investigating and resolving potential breaches, and ongoing cooperation with the regulator' for the Fair Ranking CR, which [are up to £1 million] a year. We consider this a reasonable proxy of what the compliance costs might be for our Data Portability CR. See: Google's response to the CMA's RFI. This is also consistent with a team of 5 people devoting 10 working weeks a year at a cost of £500 an hour. Using published salary ranges for consultancy work, which we believe are a reasonable proxy for compliance and monitoring salaries, we believe £500 an hour is a reasonable upper bound for compliance and monitoring salaries. See: Consultancy.uk, Fees & rates, accessed by the CMA on 27 November 2025.

5.14 Evidence from Google suggests the CR is not expected to impose significant costs on third parties.[89, 90] Some third parties indicated that our CR would provide greater certainty and reduce risk; as discussed in paragraph 1.7 above, this could reduce financing costs.

Potential benefits

5.15 Our intervention would reduce the risk for businesses and consumers in relying on the API Google currently provides voluntarily. This is because Google would be legally mandated to provide data portability of end user general search services data.[91] This would be likely to result in four benefits:

(a) more users monetising their data;

(b) user time savings;

(c) lower costs and better services in general search services and adjacent activities; and

(d) increased innovation and investment.

More users monetising data

5.16 We have received a range of evidence that more users would be able to monetise their data as a result of our Data Portability CR. For example, evidence from similar initiatives to our intervention (including Article 6(9) in the DMA[92] and open banking[93]) shows that access to data through mechanisms such as data portability can support the viability of business models which

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[89] Google's response to the CMA's RFI.
[90] Third parties using the API will continue to face certain costs (for example verification costs); whilst our intervention would increase uptake and so industry costs, benefits to third parties will rise proportionately.
[91] Several stakeholders (CODE, Gener8, Datapods, [✂], [a startup] and [✂]) indicated that providing greater legal certainty would reduce barriers to investing in applications requiring API data. See: Note of call with CODE. Note of call with Gener8. Datapods' response to the CMA's RFI. [✂] response to the CMA's RFI; [a startup's] response to the CMA's RFI; [✂] response to the CMA's RFI. For example, CODE told us that generally data portability is still an emerging market. In the EU, firms now have a legal basis for using these APIs but in the UK they could be cut off at any time because they are not yet legally covered. CODE told us that this is a barrier to investment in the UK market; Note of call with CODE.
[92] Gener8 already reward users who provide data through the API, See: Gener8, Everything you need to know about Gener8 Rewards, accessed by CMA on 16 December 2025. The API arose in response to Article 6(9) of the DMA (see paragraph 1.2 above).
[93] Open Banking enables consumers and businesses to share their data securely and initiate payments directly from their payment accounts to another bank account held by the payee without the use of cards. Open Banking helps some borrowers get access to credit. See: Bank of England, Customer data access and fintech entry: early evidence from open banking, Staff Working Paper Number 1059, February 2024, page 2.

allow users to monetise data. There are many apps that are already paying for users' data, highlighting that this is a common model across the internet.[94] Furthermore, as noted above, our intervention gives rise to increased incentives for businesses to develop applications drawing on data provided via the API that users will wish to use, thereby increasing user uptake, and the number of users that benefit from monetising their data.

5.17 Previous policy studies, academic work and data from Google indicates that the average value to users of their data is at least £1 a month and can be as high as £25.[95] Taking the lowest of these figures would imply that if our intervention led an additional [approximately 50,000-100,000] users to engage in with the API (approximately [✂] of current API users in the UK based on recent growth trends[96]),[97] then the user benefits of this proposed CR would be of the order of £1m a year in the UK and therefore sufficient to offset the costs.

User time savings

5.18 We consider that user time savings would likely result from the Data Portability CR. As noted above, our intervention gives rise to increased incentives for businesses to develop applications drawing on the data provided via the API that users will wish to use, thereby increasing user uptake and the number of users. Our intervention would improve the attractiveness of the Data Portability API relative to Google Takeout, and as

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[94] Scrimpr, A Complete List of Apps That Pay for Your Data (UK- 2025), 2025, accessed by the CMA on 3 October 2025.

[95] The £1 a month is broadly in line with Which? estimates of compensation necessary for users to share data with Google, adjusted using Ofcom data to match our data scope. This is cautious relative to similar academic estimates and third-party statements, eg Gener8 have previously said the average user can make up to £25 a month through sharing their data. See: Which? (2021), Value of the Choice Requirement Remedy, Research Report September 2021, page 6; Ofcom (2024), Online Nation – 2024 Report, 28 November 2024, pages 4, 21, 46 and 47; Technology Policy Institute - Prince, J and Wallsten, S (2020), How much is privacy worth around the world and across platforms?, Technology Policy Institute, pages 1 and 39; YouTube, Gener8, Sam Jones, Founder of Gener8, On Sky New Ian King Show, 6 March 2020, accessed by the CMA on 7 October 2025, minutes 1:05 to 1:15.

[96] In May 2025, there were approximately [100,000-150,000] API users in the UK, two months later there were approximately [200,000-250,000] users. Based on this trend we conservatively expect the user base to have reached at least [300,000-350,000] by December 2025. Google's response to the CMA's RFI.

[97] We think this is a reasonable and conservative estimate of the change in user base. As set out above (footnote 92), several third parties told us certainty would reduce barriers to investing in applications requiring API data. This could allow them to onboard more users. For instance, [a startup] indicated that this effect could be between a 30% and fourfold increase in user numbers, compared to the status quo. Our calculations using data from Google on UK Data Portability API users show that, taking a figure towards the lower end of the range [✂] and assuming it is representative of all third parties, implies [approximately 50,000-100,000] additional users. See: Datapods' response to the CMA's RFI; [a startup's] response to the CMA's RFI. Google's response to the CMA's RFI.

such, some of the new Data Portability API users may have used Google Takeout instead.[98] Such consumers would experience time saving benefits, because Google Takeout does not itself enable data transfer to intermediaries directly and requires users to take manual steps to transfer their data.[99] Given the time saving that might arise and the value of this time to consumers, the benefits to users switching from Takeout could be material.[100]

Lower costs and better services in general search services and adjacent activities

5.19 We have received a range of evidence indicating that data portability could lead to lower costs and better services in general search services and adjacent activities. This is a commonly understood benefit of many data portability regimes: for example, an OECD policy note assessing data portability policies and initiatives suggests that data portability measures can lead to increased competition, and thus lower costs and better services for consumers.[101]

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[98] Evidence on the substitutability of the API and Takeout is mixed. For instance, Google submitted that it considers Takeout and the API as complementary mechanisms. However, Google also submitted that it expects over time developers will increasingly prefer to use the API over Takeout, which implies a degree of substitutability. Furthermore, [one CODE member] submitted that they initially used Takeout to power their product but have since started using the Data Portability API, which has increased completion rates. This use implies the two are seen more as substitutes. See: Google's response to the CMA's RFI; CODE's submission to the CMA.

[99] Google, data portability API Overview, accessed by the CMA on 7 October 2025. Siddiqui, A, Android Authority, What is Google Takeout, and how do you download your Google data through it?, 16 February 2025, accessed by the CMA on 7 October 2025. Also see: Note of call with [✂].

[100] To assess the magnitude of this benefit, we assume consumers would save on average 30 minutes a year. Google submitted that Google Takeout exports could take a few seconds, but a small percentage [✂] are more than two hours; 30 minutes is equivalent to users saving five minutes on six medium exports a year. We multiply) this time saved by a measure of the user's value of time, for which we use the average UK hourly wage (in line with approaches taken by the FCA and BEIS). Using ONS data on average earnings and average hours worked, we calculate this to be £20.19 in 2025 prices. This implies around £10 in value per user per year. Google's submissions imply Takeout has [35,000-45,000] UK users; whilst the number who could switch from Takeout to the Data Portability is unknown, were a material fraction to do so the aggregate benefits could be in the hundreds of thousands of pounds each year. See: Google's to the CMA's RFI; ONS, EARN01: Average weekly earnings, published on ONS, sheet '1. AWE Total Pay', 16 December 2025, accessed by the CMA on 16 December 2025. See: ONS, Average actual weekly hours of work for full-time workers (seasonally adjusted), 16 December, accessed by the CMA on 16 December 2025. Link; FCA (2015), Pension reforms – proposed changes to our rules and guidance, page 88. BEIS (2020), Regulatory Powers for Smart Data Initiatives: Impact Assessment, paragraph 59; Google's response to the CMA's RFI; Google's response to the CMA's RFI.

[101] Reimsbach-Kounatze, C., and Molnar, A. (2024), The impact of data portability on user empowerment, innovation, and competition, *OECD Going Digital Toolkit Note*, No. 25, page 18.

5.20 Although use of the API by other general search providers has been limited to date,[102] our SMS assessment provided evidence of the importance of a wide range of data to Google's position in general search services.[103] Further, three providers of AI assistants and one search provider, explained that use of data provided via the API could give rise to several improvements, such as increased personalisation and new functionalities.[104] By providing greater certainty supporting investment in functionality drawing on the API, our intervention would have the potential to strengthen Google's competitors in general search and adjacent activities, particularly browsers and AI assistants.

5.21 We therefore expect our proposed CR has the potential to provide more reliable access to potentially valuable data to third parties; if implemented and taken up by competitors, the CR could support rivalry faced to Google across search and wider AI activities. In turn this would lead to lower costs of advertising for businesses, better-quality services, and more investment. Even if only small effects were felt in any of the activities outlined above, the impact would be significant given their widespread use and role in facilitating everyday activities.[105]

Increased innovation and investment

5.22 Evidence from similar proposed policies and initiatives to our intervention (including Smart Data[106] and Open Banking[107, 108]) suggests that increasing

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[102] See evidence from 4 general search providers: Note of call with [✂]; [✂] response to the CMA's RFI; [✂] response to the CMA's RFI; [✂] to the CMA's RFI.
[103] Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraphs 5.187 to 5.207.
[104] [✂] response to the CMA's RFI; [✂] response to the CMA's RFI; [✂] response to the CMA's RFI; [✂] response to the CMA's RFI.
[105] For instance, as set in the CMA's final SMS decision, Google has had a share of queries greater than 90% for several years and also has tens of millions of UK users. Furthermore, since late 2022, AI assistants, such as ChatGPT, have emerged and seen rapid growth in their usage. See: Strategic Market Status investigation into Google's general search services: Final Decision (SMS Decision), 10 October 2025, paragraphs 4.122, 5.24 and 5.26. Finally, browsers also have tens of millions of UK users and are a key gateway for UK mobile device users to access and search the internet. See: Strategic Market Status investigation into Google's mobile platform: Final Decision (SMS Decision), 22 October 2025, paragraph 8.63.
[106] Department for Science, Innovation, and Technology (2024), Data (Use and Access) Impact Assessment, pages 83 to 88; Department for Business and Trade (2024), The Smart Data Roadmap – Action the government is taking in 2024 to 2025, April 2024, page 3.
[107] Bank of England (2024), Customer data access and fintech entry: early evidence from open banking, Staff Working Paper Number 1059, February 2024, pages 2 to 4; Open Banking, OBL celebrates seventh anniversary of PSD2 and the creation of open banking, 13 January 2025, accessed by the CMA on 30 September 2025.
[108] The early stage of smart data reforms means we exclude any requirements on Google in the alternative scenarios.

business access to customer data can increase investment and innovation. Furthermore, Google and third-party evidence indicates that if our intervention provided increased certainty that the API will continue to be available, this could help bring forwards investment and innovation in wider activities,[109] for example health and financial use cases.[110] These use cases could give rise to economic benefits in various ways such as businesses being able to provide existing services more efficiently or productively,[111] leading to reduced costs to consumers.

5.23 In line with the broad approach undertaken by the UK government to evaluating benefits of certain data portability measures,[112] we undertook an illustration of the potential magnitude of benefits attributable to use cases which enhance business productivity.[113] This indicates that even if only five new firms (with use cases that enhance business productivity) benefit from our intervention set up each year,[114] the benefits could be of the order of £2 million per year in the UK.[115] We regard this as a conservative estimate

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[109] CODE's submission to the CMA; note of call with Gener8; Datapods' response to the CMA's RFI; [✂] response to the CMA's RFI; [a startup's] response to the CMA's RFI; [✂] response to the CMA's RFI.
[110] CODE's submission to the CMA; Google's response to the CMA's RFI.
[111] Evidence from analysis of Smart Data, suggests that access to more data can make firms more productive. For instance, see: Frontier Economics (2021). Estimating the benefits to third party providers and small and micro firms from Smart Data, BEIS Research Paper Number 2022/020, page 6; Department for Science, Innovation, and Technology (2024), Data (Use and Access) Impact Assessment, pages 83 to 88.
Furthermore, our analysis suggests around a third of CODE members that use, have used or may use the API have use cases that are productivity enhancing. See: CMA analysis of CODE's submission.
[112] Department for Science, Innovation, and Technology (2024), Data (Use and Access) Impact Assessment, pages 83 to 88. Frontier Economics (2021). Estimating the benefits to third party providers and small and micro firms from Smart Data, BEIS Research Paper Number 2022/020.
[113] We focus here on only a subset of use cases (productivity). The true benefits will be even greater, since they will include other use cases such as health and financial use cases.
[114] We believe this is a reasonable estimate of firm numbers. For instance, in the first year of the Data Portability API's availability in the EEA, Google received less than 20 application verification requests for the Data Portability API. Whilst not all of these will have business productivity enhancing use cases, evidence from CODE suggests around a third will, and we expect more firms to emerge and request verification for the API due to the increased certainty our intervention brings. Furthermore, some firms will also benefit indirectly through the products other firms developing using the Data Portability API. See: Google's response to the CMA's RFI; CMA analysis of CODE's submission to the CMA.
[115] We first approximate the Gross Value Added (**GVA**) of new firms that may set up to benefit from our intervention. Due to the lack of publicly available data on technology start-ups we proxy this using the average GVA of a UK firm, which we estimate using ONS data on average economy wide GVA and DBT data on the number of businesses. We inflate this to October 2025 prices using ONS CPI Index data, to get an estimated UK firm level GVA of around £500,000. We downweigh this result slightly to account for the fact the firms we are considering are start-ups, therefore, we approximate the average GVA of a start-up firm that may use our intervention at around £400,000. Finally, we assume for these firms that their entire GVA is contingent on our intervention, therefore we approximate the GVA impact of our intervention for each firm to be around £400,000. See: Department for Business and Trade, 'Business population estimates for the UK and regions 2024: detailed tables (MS Excel), 3 October 2024, accessed by the CMA on 28 November 2025, Table 25; ONS, Gross Value

relative to the potential benefits that could accrue if data portability leads to valuable use cases as has been the case with other data opening initiatives. For example, the value of Open Banking to the UK economy has been estimated at over £4 billion.[116]

Provisional conclusion on proportionality

5.24 Our overall provisional assessment is that the benefits of the measure would be likely to significantly outweigh the costs.[117] First, we find that the costs would be negligible (unlikely to be greater than [up to £1] million per year). We have then identified a broad range of benefits. Given the breadth of these benefits, an effective remedy would be likely to produce benefits, which exceed the costs. To illustrate the possible magnitude of benefits we have undertaken some illustrative quantifications of some of the benefits of the Data Portability CR. Even if only around a third of the quantified illustrative benefits were to arise (and none of the unquantified benefits), the benefits would still exceed the costs, and the intervention would be proportionate.

Added (Average) at basic prices: CP SA £m, 14 August 2025, accessed by the CMA on 28 November 2025; ONS, CPI Index 00: ALL ITEMS 2025 = 100, 19 November 2025, accessed by the CMA on 17 December 2025.

[116] Open Banking, The Future is Open: Navigating the Next Phase of UK Open Banking, 17 March 2025, accessed by the CMA on 7 January 2026.

[117] We have not identified relevant notable impacts of this intervention for people with protected characteristics.

6. Questions for consultation

6.1 We welcome views on any aspect of the Data Portability CR design or analysis set out above, but are particularly interested in stakeholder feedback on the following questions:

(a) Do you agree with the aim of the Data Portability CR and how we propose to implement the Data Portability CR to meet that aim?

(b) Do you consider the proposed Data Portability CR would result in the potential benefits we have identified (for example, value and innovation)?

(c) Do you agree with our proposal to use Interpretative Notes to clarify the conduct we expect from Google to comply with the Data Portability CR?

(d) Do you agree with the content of the Interpretative Notes? Are they sufficiently clear and comprehensive? Do they cover the right issues? Are there any gaps?

(e) Do you agree with our proposals for compliance reporting and for monitoring the effectiveness of the proposed intervention? Have we identified the right metrics?