Annex:
Play's existing practices and policies relating to app review, app ranking, and use of data

I. **Google conducts its app review process in a fair, objective, transparent, and non-discriminatory manner**

1. Play conducts its app review based on publicly available policies, which are accessible in one place on the Developer Policy Center.[1] Google applies these policies objectively and consistently. Google does not apply any additional or hidden criteria, and all apps—including Google's first-party apps—are reviewed according to the same standards.

2. Google invests significant resources to ensure that Play's policies are transparent and as easy as possible for developers to understand and comply with. These efforts include the following, which are available regardless of whether the developer is registered with Play:

    a. All policies are written in plain English to be clear and understandable, and Google offers translations in multiple languages.

    b. Google offers a comprehensive library of on-demand, interactive training modules in the Google Play Academy.[2] These courses cover all major policy categories, providing engaging, practical guidance, case studies, and quizzes to help developers learn how to comply in their own time. Google Play Academy currently has over 60 deep-dive courses on all aspects of Play's policies, and most are designed to be completed in under 10 minutes.

    c. For more complex issues, Google also releases detailed guidance notes, best-practice advice, and publishes blogs to explain policy application in practical terms.

    d. Developers can also browse the Google Play Developer Help Community to ask questions and get answers about their apps and Play policies from certified Google Product Experts and members of Play's Trust & Safety Team.[3] Developers can—and do—ask nuanced policy questions about their specific app's functionality and receive guidance directly from Google.

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[1]   *See* Google Play, Developer Policy Center.

[2]   *See* Google, Play Academy.

[3]   *See* Google, Google Play Developer Help Community.

3. When Google makes changes to its policies, it conducts extensive outreach to support developers in understanding the changes and any steps they need to take. This outreach includes: direct emails to developers, notifications on the policy announcements page,[4] explanatory blog posts, video explainers on the PolicyBytes channel (which break down complex topics into short, 3-5 minute videos);[5] and live Q&A webinars[6] held in multiple languages and time zones to answer developer questions directly.[7]

4. Play implements its app review practices based on its published policies: fairly, objectively, transparently, and on a non-discriminatory basis. This review process is sophisticated and forensic. Every app and update on Play goes through 10,000 safety checks before publication.[8] This process operates in two stages:

    a. Play's automated systems, which incorporate machine learning tools, screen apps for potential violations of Play's policies. These screening technologies are applied in the same way to all apps and app updates.

    b. If the screening identifies a potential violation requiring human review, the submission is reviewed by a subject matter expert. To ensure objectivity, this manual process is supported by the following structural safeguards:

        i.   The manual review is conducted by trained review agents. These review agents do not have any strategic or business role within Play.

        ii. The teams that develop Google's first-party apps have no part in the review process. They have no influence over enforcement decisions, ensuring that the same app review process applies strictly to both first-party and third-party apps.

        iii. The review agents apply detailed enforcement guidelines provided by the Google safety team to ensure an objective and consistent standard of review. They also receive ongoing training on these policies. In complex cases where the appropriate outcome is unclear, they can escalate the matter for resolution.

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4   *See* Play Console Help, Announcements.

5   *See* Google, PolicyBytes: your video guide to Google Play policies.

6   *See* Google, Policy Webinars.

7   All Play policy changes are summarised, alongside resources and deadlines, in one place at goo.gle/playupdates.

8   *See* Google, 6 ways Google Play helps keep you safe.

5.   UK developers recognise Google's ongoing efforts in this regard. In the Mobile Ecosystems Market Study (**MEMS**), the CMA found that "[m]*any developers told us that Google's app review process is less onerous than Apple's, with Google providing more clarity on reasons for rejection and being more willing to engage with developers to resolve any issues identified*".[9]   The CMA also received feedback from "*a number of developers*" at the app developer workshop it held on 24 March 2025 that "*Google is generally more flexible and responsive than Apple, which allows for a better process for third-party apps.*"[10]

II.   Google ranks apps on Play in a fair, objective, transparent, and non-discriminatory manner

6.   Google ranks apps on Play in a fair, objective, transparent, and non-discriminatory way. Play's app ranking is based on three overarching criteria: (1) user relevance, (2) app quality, and (3) user experience.[11]   Play's algorithmic app ranking applies non-discriminatorily to third-party and first-party apps. Google applies a rules-based and algorithmically driven app ranking system, which removes the scope for inconsistent manual treatment. This is essential to Play's business model. It is in Google's interest to ensure high-quality apps are promoted to users, as this improves their experience and builds trust in Play and Google's platform.

7.   Google ensures that developers understand how Play's app ranking works. Google is therefore transparent about the principles that underpin Play's app ranking. This approach ensures that app ranking is centered on measurable indicators of app quality, like ratings, reviews, engagement, and technical performance. It also ensures a level playing field where developers are incentivised to compete on the quality of their product, not on their ability to manipulate ranking signals.

8.   Google invests in products and features designed to increase UK developers' confidence around how Play ranks apps. While specific ranking algorithms must remain confidential to guard against the risk of manipulation and ranking abuse, Google provides sophisticated tools that give developers transparency into the primary drivers of visibility on Play.

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9   CMA, MEMS, Final Report, 10 June 2022, ¶6.53.

10   CMA, Mobile SMS Investigations, App Developer Workshop, 24 March 2025, p. 3.

11   *See* Play Console Help, App discovery and ranking.

9. Google provides developers with the information they need to succeed, and provides public guidance and documentation on the principles that drive app ranking, such as app quality and technical performance. To achieve this, Google is transparent about the principles of Play's app ranking system:

   a. Google explains the key factors Play considers on the [developer help pages](#), with a strong emphasis on app quality, relevance, and user engagement.

   b. Google supports this through a robust outreach program—including online training courses, webinars, and Play Academy—that provides actionable guidance on improving quality metrics like stability and performance.

   c. Google backs these measures up with a powerful suite of testing and analytics tools in the Play Console, allowing developers to put Play's guidance into practice.

III. Google does not use non-public Play data to give its own apps a competitive advantage

10. Google implements Play's data practices, fairly, objectively, transparently, on a non-discriminatory basis, in line with its internal data policies and [Business Data Responsibility](#) site.

11. Google safeguards third-party developers' non-public data received in the context of Play's app review process and any non-public data Google has access to from Play's operation as an app store. Safeguarding mechanisms comprise the following:

    a. Google safeguards such data in line with its internal data policies and [Business Data Responsibility](#) site. These policies strictly prohibit the inappropriate use of Play developer data. They also prohibit Google employees from sharing, copying, or otherwise further distributing that data after they have gained access. These policies are supported by Google's Employee Code of Conduct, which mandates strict compliance subject to disciplinary action.

    b. Google supports its data use policies with tried-and-tested technical access controls which prevent non-compliant data access and use. These robust controls technically gate data access, and ensure that data is only accessed and used for a specific and compliant purpose, in line with Google's internal data policies. In more detail:

   i. Google's technical access controls are designed to refuse data access by default.

   ii. To gain access, Google employees and teams must submit an access request detailing: (i) the intended use case for the data; and (ii) a completed acknowledgement of Google's internal data policies.

   iii. Google's data access owners assess the access request, and grant access only where the specified use case is appropriate and compliant with Google's data access policies.

  c. Google deploys training for relevant data access owners to ensure access to such data is only granted consistent with Google's policies.

12. Consistent with Google's internal data policies, Google does not use non-public Play data to support the development of its first-party apps.

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