

Search SMS: Proposed Data Portability CR Roundtable

12 February 2026

Introduction

As part of its consultation on proposed conduct requirements (**CRs**) relating to Google's Strategic Market Status (**SMS**) in general search services, launched on 28 January 2026, the CMA held a series of roundtables with affected industry stakeholders to gain feedback on the proposed CRs.

The events were chaired by the Project Director, Digital Markets and attended by other members of the CMA staff including the case team.

This note summarises the views expressed by 19 businesses and 1 trade association who attended the Data Portability Roundtable. The CMA will consider these views alongside the wider body of evidence it has gathered through the consultation on the CRs.

Overview

The CMA welcomed participants to the roundtable and set out the purpose of the session: to explain the proposed Data Portability CR and seek views from interested and affected parties on the proposed CR.

CMA staff summarised the proposed CR for data portability, including its aim and scope as well as proposals in relation to compliance and monitoring of the CR, as set out in the [consultation document](#). Attendees were given an opportunity to respond and ask questions.

Rationale for and aim of the proposed Data Portability CR

The CMA asked for any views on the rationale for, and the aim of, the proposed Data Portability CR. One search engine provider noted that third parties need to build their own capability to use the API. This involves spending on resources, which needs to be justified through consumer demand. This participant asked if the CMA had spoken to consumers and if there was consumer demand. The CMA explained that it had not spoken to individual consumers, but had engaged with consumer organisations when developing the proposed CR as well as with third-party businesses that were making use of the API. The CMA noted a range of potential use cases. A personal information management system business described the positive impact the Data Portability API had already had on its business with an overwhelming demand from users to share their data. The participant had carried out hundreds of consumer interviews, with users predominantly in favour of innovative use cases.

Key design considerations

Scope of the data portability API

The CMA discussed the scope of the proposed CR, including the similarities and differences with the EU's Digital Markets Act. One advocacy group asked if the wording 'as amended from time to time' in the proposed CR was intended to take into account specification decisions the

European Commission might make. The CMA clarified that the intention was to cover changes to data scope that could be made through an amendment to the DMA. In relation to the impact of specification proceedings, the CMA would like to consider this further and welcomed stakeholder views via written responses to the consultation.

The CMA was keen to hear views and submissions on whether the CR scope was framed correctly, and reflections based on experience of using the API. A representative of a trade association asked the CMA to clarify how it would ensure that the intervention remains proportionate over time. The CMA highlighted that the UK regime allowed flexibility, so the CMA could monitor closely how the proposed CR is operating (as well as other relevant factors such as developments in the EU) and consider whether it needed to be varied or removed.

Compliance and monitoring

The CMA asked whether the compliance and monitoring metrics it had proposed in the consultation document were appropriate. One search engine provider asked what the destinations for the data would be, including whether it would be exported to end users or to third parties and, if the latter, whether the number of authorised third parties would be a consideration for the CMA when thinking about implementation and compliance. The CMA clarified that the proposed CR only required the provision of data to authorised third parties and not to the individual end user themselves. In practice, this involved Google making the API available to relevant third parties which must obtain consent from end users.

A representative of a trade association asked how, if uptake was underwhelming, the CMA would determine whether the reason was a lack of consumer appetite and the attractiveness of use cases or a compliance issue. The CMA noted its statutory duty to keep CRs under review. In relation to future use cases which may emerge, a personal information management system explained that their business was trying to make it easy for developers to build on top of this data and plans to publish something on this in future.

The same business asked if the proposed CR would be agnostic in terms of how businesses use the data, as under the DMA. The CMA confirmed that the proposed Interpretative Notes to the proposed CR stated there should not be restrictions on subsequent data use.

Next steps

The CMA advised that the CRs, if imposed, would be enforceable. This could include issuing an enforcement order if Google was found to not be complying with the obligations. The Interpretative Notes are used to provide further information on the CMA's intention and give more detail on what compliance would look like.