

NOTICE UNDER SECTION 19(1) OF THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT 2024 (THE ACT)

On 10 October 2025, the Competition and Markets Authority (**CMA**) published its decision to designate Google as having strategic market status (**SMS**) in respect of general search services.¹ The CMA hereby gives notice under section 19(1) of the Act that it is imposing a conduct requirement (the **Data Portability Conduct Requirement**) on Google relating to its general search services.

This Notice sets out the matters in respect of the Data Portability Conduct Requirement required by section 21 of the Act.

The Data Portability Conduct Requirement

Definitions

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.

¹ See the [SMS decision notice](#) for the descriptions of the designated undertaking and relevant digital activity.

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.

1. The Interpretative Notes accompanying this Notice provide information about the CMA's interpretation of the Data Portability Conduct Requirement. It is open to Google to take a different approach where it is able to demonstrate to the CMA that its approach complies with the terms of the Data Portability Conduct Requirement.

The CMA's reasons for imposing the Data Portability Conduct Requirement

2. The reasons for the CMA's decision to impose the Data Portability Conduct Requirement are set out in the Data Portability CR Final Decision, which is available via the [CR page](#).

Statutory objectives

3. The CMA considers it proportionate to impose the Data Portability Conduct Requirement for the purposes of the fair dealing objective in section 19(6) of the Act.

Permitted types

4. The Data Portability Conduct Requirement is for the purpose of section 20(3)(h) of the Act: preventing Google from restricting the ability of users or potential users to use products of other undertakings.

Benefits of imposing the Data Portability Conduct Requirement

5. The benefits that the CMA considers would likely result from the Data Portability Conduct Requirement are set out in the Data Portability CR Final Decision, which is available via the [CR page](#).

Implementation and term of the Data Portability Conduct Requirement

6. The Data Portability Conduct Requirement will come into force three months after the date of this Notice.
7. As set out in the SMS Decision Notice, the last day of the designation period for the designation to which the Data Portability Conduct Requirement relates is 10 October 2030, subject to the provisions in the Act for extension of that period and revocation of the SMS designation.

8. This Notice shall continue in force until 10 October 2030 or until such time as it is varied under section 19(2) of the Act or revoked under section 22(2) of the Act. Any variation or revocation shall not affect the validity or enforceability of any rights or obligations that arose prior to such variation or revocation.
9. Under section 17 of the Act, where the CMA decides, as a result of a further SMS investigation under section 10 of the Act, to revoke Google's SMS designation in respect of general search services, the CMA may make transitional, transitory or saving provision in respect of the Data Portability Conduct Requirement. Where the CMA decides to designate Google again as having SMS in respect of general search services, or to designate Google as having SMS in respect of a digital activity that the CMA considers to be similar or connected to general search services (whether instead of, or in addition to, general search services), the CMA may apply the Data Portability Conduct Requirement to Google in respect of the new designation, with or without modification; and make transitional, transitory or saving provision in respect of the Data Portability Conduct Requirement.
10. Under section 25 of the Act, the CMA must keep under review: (a) whether to vary or revoke the Data Portability Conduct Requirement; (b) the extent to which Google is complying with the Data Portability Conduct Requirement; (c) the effectiveness of the Data Portability Conduct Requirement; and (d) whether to take enforcement action in respect of any breaches or suspected breaches of the Data Portability Conduct Requirement.
11. Google is required to provide the CMA with periodic compliance reports in relation to the requirements set out in this Notice. Details of those requirements are set out in the Data Portability CR Compliance Reporting Notice published on the same date as this Notice.

How the Data Portability Conduct Requirement interacts with other conduct requirements imposed on Google

12. The CMA has considered the Publisher Conduct Requirement, which the CMA imposed on 3 June 2026² and the Fair Ranking Conduct Requirement, which the CMA has imposed on Google on the same date as the Data Portability Requirement.³ Given the different focus of the Data Portability Conduct Requirement, we do not consider it interacts with either of the other two conduct requirements.

Competition and Markets Authority, 17 June 2026

² [Publisher CR Notice](#).

³ [Fair Ranking CR Notice](#).