

# NOTICE UNDER SECTION 84(3) OF THE DIGITAL MARKETS, COMPETITION AND CONSUMERS ACT 2024 (THE ACT)

1. On 17 June 2026 the Competition and Markets Authority (the **CMA**) imposed the Data Portability Conduct Requirement on Google relating to its general search services.<sup>1</sup> The CMA hereby gives notice under section 84(3) of the Act of Google's compliance and reporting obligations in respect of the Data Portability Conduct Requirement.
2. Part 1 of this Notice sets out Google's reporting obligations including:
  - (a) the manner and form of the compliance report to be provided in relation to the Data Portability Conduct Requirement; and
  - (b) the contents of the compliance report to be provided in relation to the Data Portability Conduct Requirement.
3. Part 2 of this Notice sets out relevant administrative information including:
  - (a) the reporting periods for the Data Portability Conduct Requirement;
  - (b) the CMA's expectations in relation to the publication of compliance reports for the Data Portability Conduct Requirement; and
  - (c) the CMA's expectations in relation to the implementation period for the Data Portability Conduct Requirement.
4. The CMA will publish a copy of this notice on its website in accordance with the [Digital Markets Competition Regime Guidance](#) (the **Guidance**).<sup>2</sup>

## PART 1: REPORTING OBLIGATIONS

### Manner and form of the compliance report

5. For each reporting period set out in Part 2, Google should prepare and submit a written report (a **compliance report**) to the CMA that provides the information set out below.

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<sup>1</sup> See the Data Portability Conduct Requirement Notice, available on the [CR page](#) and can also be accessed via the [case page](#).

<sup>2</sup> See paragraph 6.47 of the Guidance.

6. A Nominated Officer must be appointed by Google in relation to each digital markets requirement, which includes a conduct requirement, to which it is subject, including the Data Portability Conduct Requirement. The Nominated Officer is responsible for, amongst other things, monitoring Google's compliance with its digital markets requirements and securing that Google complies with respective compliance reporting requirements.<sup>3</sup>
7. We expect Google to notify the CMA of the identity of the Nominated Officer appointed in relation to the Data Portability Conduct Requirement within the first month of receiving this Notice. When notifying the CMA, Google should explain how the appointment meets the requirements of the Nominated Officer role set out in the Act and Guidance.<sup>4</sup>
8. The Nominated Officer appointed by Google in relation to the Data Portability Conduct Requirement shall submit compliance reports via email to [searchsms@cma.gov.uk](mailto:searchsms@cma.gov.uk).

## **Contents of Compliance Reports**

9. Each of Google's compliance reports should include, as a minimum, the information set out below.

### **Assessment of compliance**

10. A comprehensive explanation of the extent to which the Nominated Officer considers that Google has complied with the Data Portability Conduct Requirement during the relevant period. This explanation should include any relevant supporting data and internal documents. This explanation must enable the CMA to verify whether Google has complied with the Data Portability Conduct Requirement and should include a description of:
  - (a) how Google has complied with the Data Portability Conduct Requirement including: (i) any changes Google has made during the reporting period; and (ii) any existing practices in place prior to the reporting period and / or the Data Portability Conduct Requirement coming into force which ensure Google's compliance;
  - (b) the extent to which Google has applied the CMA's interpretation of the Data Portability Conduct Requirement as set out in the Data Portability CR Interpretative Notes; and
  - (c) how Google has assessed its compliance with the Data Portability Conduct Requirement during the reporting period, including whether any internal or

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<sup>3</sup> See section 83 of the Act.

<sup>4</sup> See section 83 of the Act and paragraphs 6.27 to 6.38 of the Guidance for further information on the role and responsibilities of the Nominated Officer.

external audits have been carried out. As part of this, Google should provide the details of any such audits including their methodology and results.

11. Google should, as a minimum, provide the following metrics, each in relation to UK End Users of the tools provided pursuant to the Data Portability Conduct Requirement during the reporting period, broken down by month:
  - (a) the percentage of successfully served requests via these tools;
  - (b) the percentage of data exports made via these tools that completed within 24 hours;
  - (c) the percentage of files successfully exported in completed requests via these tools;
  - (d) the percentage of uptime of these tools in each 24-hour window; and
  - (e) the number of UK End Users who initiated an export via these tools.
12. As set out in Part 2 below, the first reporting period includes the implementation period and the first day of the Data Portability Conduct Requirement coming into force. The compliance report for this first reporting period should therefore, in so far as is relevant, set out the information above in respect of Google's compliance with the Data Portability Conduct Requirement as of the first day it comes into force including any steps taken during the implementation period to ensure compliance on day one.

### **Details of general engagement with third parties**

13. A summary of the engagement Google has had with any third parties during the reporting period in respect of:
  - (a) Google's development and implementation of any changes to comply with the Data Portability Conduct Requirement including the details of any consultation that was carried out with end users or business users in respect of any changes; and
  - (b) any compliance concerns raised by third parties relating to Google's application of the Data Portability Conduct Requirement, including steps taken to investigate concerns raised by third parties, the conclusion of such investigations, and details of any follow-up actions taken.

### **Declaration of completeness and accuracy**

14. The compliance report must include a declaration from the Nominated Officer that they have taken reasonable steps to satisfy themselves that the information contained in the compliance report is complete and accurate.

## PART 2: ADMINISTRATIVE INFORMATION

### Reporting periods

15. To ensure alignment with current compliance reporting under Article 11 of the Digital Markets Act and to minimise the burden on Google, reporting periods will run from 1 January to 31 December each year except for the first compliance report.
16. The first compliance report should cover the period from the date of the Data Portability Conduct Requirement's imposition on 17 June 2026 and end on 31 December 2026. Thereafter compliance reports should cover 12-month periods.
17. Compliance reports should be submitted to the CMA by 6 March each year. This allows Google to prepare data from the reporting period and draft the report, in line with current DMA Article 11 reporting arrangements.

### Schedule of compliance reports

Reporting Period	Report Due Date
17 June 2026 – 31 December 2026	6 March 2027
1 January 2027 – 31 December 2027	6 March 2028
Repeating annually thereafter as long as the Data Portability Conduct Requirement remains in effect.	

### Publication of compliance reports

18. Following receipt of a compliance report, the CMA expects to issue a subsequent notice in accordance with section 84(5) of the Act requiring Google to publish a summary and/or non-confidential version. The notice will specify the scope of information and compliance metrics Google is required to include in the public version of the report and require Google to make the public version of the report available on Google's website in a clear, accessible position to third parties.

### Implementation period

19. In accordance with the approach set out in the Guidance, the CMA expects Google to work constructively with the CMA during the implementation period of the Data Portability Conduct Requirement to assist the CMA to understand Google's compliance plan.<sup>5</sup>

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<sup>5</sup> See paragraph 3.69 of the Guidance.

**Version Control**

20. In accordance with section 84(4) of the Act, the CMA may amend the requirements specified in this Notice by giving a further notice to Google.

<b>Version</b>	<b>Date</b>
1	June 2026

**Competition and Markets Authority**

17 June 2026