Checkmyfile

Response to CMA consultation on steering conduct requirement for Apple's/Google's Mobile Platforms – July 2026

Checkmyfile welcomes the opportunity to respond to the CMA's consultation on the steering conduct requirements for Apple and Google's mobile platforms.

Checkmyfile is a UK-based credit reporting service that enables consumers to access and understand their credit information. The service brings together data from the UK's major credit reference agencies into a single report, helping customers monitor their credit position, identify inaccuracies and make informed financial decisions.

Checkmyfile primarily serves customers through its website and subscription-based services. As a digital business, mobile applications represent a potential channel through which customers could access their credit information and manage their accounts. Consequently, app store rules, payment requirements and associated fees would have materially affected the commercial viability of app-based services and investment decisions relating to mobile product development.

Unless otherwise stated, all references in this document apply to both Apple and Google. Any points relating specifically to only one of the companies will be clearly identified.

We confirm that this response does not contain any confidential information and we are happy for it to be published on the CMA website.

General

Do you have any views or evidence on the benefits or costs of the proposed Steering CR?

Checkmyfile supports the proposed Steering Conduct Requirement.

We have previously considered developing a mobile application to complement our web-based product, however, the commission structures historically applied by Apple and Google significantly reduced the commercial viability of the investment. A commission of up to 30% on subscription revenue would have materially reduced margins and is not commercially viable.

We believe the proposed Steering CR could promote innovation and competition by enabling businesses such as Checkmyfile to maintain a direct relationship with customers and utilise their existing payment infrastructure, instead of being required to pay substantial app store commissions.

The principal costs of the proposal appear limited and are outweighed by the benefits of increased competition, consumer choice and innovation.

Do you have any views on the proposed scope of the Steering CR in particular:
- **(a) Allowing Apple/Google to require that any steering links must direct users to a developer's own website; and/or**
- **(b) Allowing Apple/Google to require that any steering links be for purposes of completing steered transactions?**

For Checkmyfile, directing customers to our own website would be sufficient, allowing customers to complete transactions on our own website would enable us to utilise existing infrastructure.

Our primary interest in steering relates to the completion of subscriptions and payments. In our case, the main commercial concern is the ability to direct customers to our own website to purchase or manage a subscription. We therefore generally support the CMA's proposed approach but believe developers should retain sufficient flexibility to communicate with customers regarding account management.

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Please share any general or specific views you have on the measures that Google rolled-out in the UK on 30 June 2026.

Checkmyfile welcomes Google's decision to introduce greater flexibility in relation to alternative billing, external steering and third-party app stores. In principle, these measures represent a positive step towards improving developer choice and reducing the extent to which access to mobile customers is dependent on a single app store payment system.

However, we do not consider that the measures fully address the underlying concerns that the proposed Steering Conduct Requirement is intended to resolve. The revised fee structure remains complex and, in some cases, still involves material charges on transactions completed outside Google Play Billing. For subscription-based businesses such as Checkmyfile, even reduced fees can materially affect the commercial case for investing in an app, particularly where the customer relationship, payment processing, compliance obligations and customer support are primarily managed by the developer.

We are also concerned that the distinction between existing installs and new installs, and the interaction between service fees, billing fees and programme-specific rates, may make it difficult for developers to assess the true cost of distribution through Google Play. A developer considering whether to launch or expand an app-based service needs clear, predictable economics. If the applicable fee depends on the route taken by the customer, the timing of install, programme eligibility or subsequent updates to Google's terms, this may continue to create uncertainty and deter investment.

In relation to steering, the practical effectiveness of the measures will depend on the detailed implementation. Developers should be able to inform users clearly that alternative payment options are available and should be able to direct users to their own website without excessive friction, discouraging language or repeated warning screens. Any consumer protection measures should be neutral, proportionate and limited to what is necessary to ensure users understand when they are leaving Google Play Billing.

The Registered App Stores programme may also improve competition in app distribution if it genuinely reduces barriers to trusted third-party app stores. However, the quality and safety criteria should be objective, transparent and applied in a way that does not allow Google to retain undue control over alternative routes to market.

Overall, while Google's UK measures are a welcome acknowledgement that greater openness is needed, they should not be treated as a substitute for a clear and enforceable Steering Conduct Requirement. The CMA should monitor the practical impact of the measures closely, including whether developers are able to steer effectively in practice, whether fees remain proportionate to the services actually provided by Google, and whether the user experience enables rather than undermines informed consumer choice.

User experience and design options

Do you consider our proposals would achieve both enabling effective steering in practice, and allowing Apple/Google to introduce necessary measures to protect and inform users?

Overall, we believe the proposal strikes an appropriate balance between providing greater freedom for app developers and protecting consumers.

The proposal appears capable of reducing barriers to investment while still allowing Apple and Google to provide appropriate consumer protection measures. For Checkmyfile, the key issues is whether steering can be exercised effectively. The proposal should ensure that developers can communicate alternative payment options without unnecessary restrictions, excessive friction or messaging that discourages consumers from using those alternatives.

Are there additional risks and mitigations that you consider could be addressed through a steering CR?

In our view, a Steering CR should address not only whether developers are technically permitted to include steering links, but also whether steering can operate effectively and safely in practice. The main risk is that platform rules could permit steering in principle while limiting its practical value through restrictive wording, excessive warning screens, design requirements or fee structures that make alternative payment routes commercially unattractive.

The Steering CR should therefore require any consumer-facing notices to be neutral, factual and proportionate. Apple and Google should not be permitted to use language, visual design or repeated prompts that imply alternative payment methods are inherently unsafe or inferior where the developer is directing users to its own legitimate website.

There is also a risk that consumers may be confused about who is responsible for the transaction, payment support, refunds, cancellations and account management once they leave the app store payment environment. A suitable mitigation would be to allow platforms to require clear disclosure that the transaction will be completed with the developer, while ensuring that such disclosure does not become a deterrent or a substitute for effective steering.

For subscription services such as Checkmyfile, the CR should also ensure that steering is not limited only to the initial purchase. Customers may need to manage their subscription, update payment details, access support, cancel, renew or change their account through the developer's website. Restrictions that prevent developers from communicating with customers about these related account-management functions would reduce the effectiveness of the remedy.

Finally, the CMA should mitigate the risk of circumvention by requiring transparency and ongoing monitoring. Any changes to platform rules, fees, eligibility criteria, technical requirements or user-facing screens should be capable of review to ensure that they do not undermine the purpose of the Steering CR. This would help ensure that the remedy remains effective as platform policies and commercial models evolve.

Do you have any views on allowing a single neutral interstitial screen that informs an end-user that they are moving outside of in-app purchase system? In particular:

- **(a) Do you consider that this is appropriate?**
- **(b) Do you have views or evidence on how to further reduce the friction from these interstitial screens (eg by time-bounding, frequency-bounding, default settings or reserving the screens for specific transactions)?**

We support the use of a neutral information screen informing customers that they are leaving the app store payment environment. However, these screens should be factual, proportionate and neutral. The objective should be informing consumers rather than discouraging them from completing a transaction through alternative payment channels.

Any interstitial screen should be displayed only when necessary. Repeated warnings or multiple confirmation steps may discourage consumers from using legitimate payment routes and could undermine the effectiveness of steering. Where appropriate, consumers should be able to acknowledge the notice once and avoid unnecessary repetition in future transactions.

What do you consider to be the benefits and drawbacks of allowing Apple to prohibit steering to WebViews?

Checkmyfile's primary concern is reducing unnecessary friction in the customer journey. We support whichever approach best balances transparency with usability. If WebViews can be used safely and transparently, allowing them may reduce customer abandonment and improve the overall experience.

The CMA should seek to ensure that any restrictions do not unnecessarily reduce the effectiveness of steering.

Steering fees

Do you have any views on the approach to steering fees in the proposed Steering CR, in particular:

(a) **Do you consider the principles the CMA has proposed are appropriate, including the use of cost-plus and value, how each are defined, and the relationship between these two principles?**
(b) **Do you have any views on the practical benefits and risks of the principles the CMA has proposed?**
(c) **Do you have any other views or evidence on the principles that Apple must apply when setting steering fees?**

We support the CMA's view that any steering fee should be constrained by clear principles and should not simply replicate the economic effect of existing app store commissions. In particular, a steering fee should not be set at a level that makes the ability to steer commercially ineffective.

We consider cost-plus to be the more appropriate primary principle. Where a developer completes a transaction through its own website and payment infrastructure, Apple is no longer providing the payment processing, billing, refund handling or related transaction services associated with in-app purchase. Any residual fee should therefore be limited to the objectively evidenced costs Apple incurs in enabling the relevant steering functionality, plus a reasonable margin.

We accept that "value" may be relevant where Apple can show that a specific service directly helped acquire a customer or provided a clear benefit to the developer. However, this should be defined narrowly. Apple should not be able to charge simply for access to iOS users or for general benefits of its wider ecosystem. Any value-based element should help prevent excessive fees, not be used to recreate a percentage commission on sales completed outside the app store.

The practical benefit of the CMA's proposed approach is that it recognises the need to prevent circumvention of the Steering CR through fees. Without such principles, there is a significant risk that developers would be permitted to steer in form but would continue to face charges that remove most of the commercial benefit of doing so. This would be particularly important for subscription businesses such as Checkmyfile, where recurring customer relationships, compliance obligations, payment support and cancellation processes are largely managed by the developer rather than the app store.

The main practical risk is that concepts such as value, attribution and customer acquisition could become difficult to measure and open to broad interpretation. If the methodology is not transparent, Apple may be able to attribute too much value to its platform and too little to the developer's brand, product, marketing, customer service and existing web presence. This could create uncertainty and make it difficult for businesses to decide whether investment in an app is commercially viable.

For these reasons, we consider that any steering fee should be transparent, objectively justified, proportionate and capable of regulatory scrutiny. Apple should be required to explain the cost base, margin, methodology and any claimed value component. The CMA should also ensure that fees do not vary in a way that penalises developers for steering customers to their own websites, or that creates uncertainty through complex distinctions between customer types, transaction types or install dates.

In our view, the Steering CR should make clear that steering fees must not undermine the purpose of the remedy. A fee should only reflect services actually provided by Apple in connection with the steered transaction and should not capture value created independently by the developer. This would give developers greater certainty and help ensure that consumers benefit from genuine choice in payment channels.

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