

COMBINING DATA AND BUNDLING SERVICES UNDER THE DIGITAL MARKETS ACT

Implementation of Article 5 (2) and (8) DMA

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Legal information

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CONSUMER RELEVANCE

Large digital platforms such as Google, Meta, and Amazon control access to online marketplaces, digital ecosystems, and social media. They often strengthen their own market positions by impeding competitors and limiting consumer choice. Means for doing so include giving preferential treatment to their own products and services or extracting excessive amounts of data from consumers.

The Digital Markets Act (DMA) boosts consumer choice by subjecting large gatekeeper platforms to clear rules. It forbids practices that harm competition, such as obligatory registration for several company services or combining personal data from various services without user consent. Core platform services must also offer an equivalent service even in the less personalised versions, and consumers must not be exposed to manipulative designs when exercising their freedom of choice in accordance with the DMA.

SUMMARY

As of 7 March 2024, six large tech companies, designated as gatekeepers, must comply with the Digital Markets Act (DMA).¹ Following an initial compliance assessment on 7 March 2024,² the Federation of German Consumer Organisations (Verbraucherzentrale Bundesverband e.V. – vzbv) has now taken another close look at how the gatekeepers are complying with the rules. In the present evaluation, vzbv examined compliance with Article 5 (2) (combining data) and (8) DMA³ (ban on bundling services). Selected services from all six gatekeepers were examined with respect to Article 5 (2), and selected services from Alphabet, Apple, Meta, and Microsoft with respect to Article 5 (8).⁴

With respect to the services reviewed, it is difficult for users to withdraw consent to the combining of personal data in accordance with Article 5 (2). Furthermore, the choice screens are manipulatively designed to varying degrees. Consequently, vzbv feels that consumers are not in a position to give voluntary and informed consent to data sharing

¹ On 6/09/2023, the European Commission designated Alphabet, Amazon, Apple, ByteDance, Meta, and Microsoft as gatekeepers; together they operate a total of 22 core platform services, see https://ec.europa.eu/commission/presscorner/detail/en/IP_23_4328 (last accessed: 03/07/2024). On 13/05/2024, the European Commission designated Booking as an additional gatekeeper, see https://ec.europa.eu/commission/presscorner/detail/de/ip_24_2561 (last accessed: 20.06.2024). Booking has six months from that date to comply with the DMA rules.

² See <https://www.vzbv.de/pressemitteilungen/digital-markets-act-apple-und-google-setzen-einige-vorgaben-nicht-um> (last accessed: 17/06/2024).

³ In the following paper, articles referred to are from the DMA, unless otherwise specified.

⁴ An overview of the gatekeepers tested can be found in the annex. The assessment relating to Article 5 (8) is limited to those gatekeepers whose central platform services could potentially be tied to other services from the same gatekeeper. vzbv carried out the evaluation based on information on the respective service providers' websites or apps. For this purpose vzbv used a Samsung Galaxy S23 and a Google Pixel 8 smartphone, both with Android 14, as well as an Apple iPhone SE with iOS 17.5.1. The devices were restored to their factory settings for the tests. The evaluation took place between 16 May and 26 June 2024. In the case of Alphabet, vzbv also evaluated a choice screen from 12/02/2024, which is related to the combining of data on Google services after the 06/03/2024. The results were assessed using a system of pre-established categories based on the relevant legislation.

between various services. If they decline to give consent, they can use only a limited version of the core platform services in the cases described.

When it comes to the ban on bundling services, the close link between Facebook Marketplace and Facebook is particularly noteworthy. In vzbv's view, the service cannot be fully used as a marketplace without a Facebook account. When it comes to Meta's Threads and the tested services from Alphabet and Apple, it is clear that the bundling of gatekeepers' services can be problematic even when not explicitly prohibited under Article 5 (8).

I. FINDINGS OF THE EVALUATION OF ARTICLE 5 (2) (COMBINING DATA)

Article 5 (2) restricts the combining of personal data from core platform services with personal data from other core platform services, other services offered by the gatekeeper, and the services of third parties.⁵ The DMA stipulates a fundamental ban with the exception of user consent given in compliance with data protection laws. From a consumer perspective it is thus key how gatekeepers implement the option of consent. It is particularly important that choice screens shown to users are designed in a neutral, non-manipulative manner⁶, and that there are no obstacles to refusing or withdrawing consent.

vzbv tested the implementation of Article 5 (2) (1) and (3)⁷ with respect to a total of 22 core platform services relevant to consumers and other services offered by all designated gatekeepers.⁸

1. HARDER TO WITHDRAW THAN TO GIVE CONSENT TO THE COMBINING OF DATA

All the service providers tested require just one or two clicks to consent to the combining of personal data from various core platform services and/or other gatekeeper services.⁹

On the positive side, all reviewed platforms also require only one or two clicks to reject the request for consent, while the possibility of subsequently withdrawing consent is also mentioned before consent is given. Not all service providers offered a direct link to the withdrawal of consent option or included specific references to the relevant account settings.

Withdrawing consent that has been given is, with respect to all the core platform services and other gatekeeper services reviewed, considerably harder than the original giving of consent to the combining of data via the choice screen. On average, withdrawing consent requires six clicks. Meta stands out in particular, as it requires an average of eight clicks to withdraw consent to data sharing.

In addition to the sheer number of clicks required, some gatekeepers make withdrawing consent more difficult by using counter-intuitive account settings. Users have to scroll to the bottom of an extensive menu and find the option to withdraw consent under

⁵ For more detail on the individual forms of combining data in Article 5 (2) see *Podszun*, in: id. (Ed.), Digital Markets Act, 2023, Art. 5 point 15 ff.

⁶ See Article 13 (6): "The gatekeeper shall not degrade the conditions or quality of any of the core platform services provided to business users or end users who avail themselves of the rights or choices laid down in Articles 5, 6 and 7, or make the exercise of those rights or choices unduly difficult, including by offering choices to the end-user in a non-neutral manner, or by subverting end users' or business users' autonomy, decision-making, or free choice via the structure, design, function or manner of operation of a user interface or a part thereof." Similar wording can be found in Recital 70.

⁷ Article 5 (2) (2) was not reviewed. An evaluation is needed in the course of time.

⁸ See annex for details.

⁹ This statement is based on the service providers' choice screens that request users to make a decision regarding data sharing. In this report a distinction between variants a, b, c, and d of Article 5 (2) is made only in specific instances, as the vast majority of the tested choice screens cover all variants and thus require only one instance of consent.

unspecific categories such as “LinkedIn Services” (Microsoft) or “Information use for Facebook products” (Meta).

In vzbv’s view, these services violate Article 7 (3) (4) GDPR, and thus also Article 5 (2) DMA, which refers to that regulation.

2. MANIPULATIVE DESIGNS (“DARK PATTERNS”) ARE COMMON

All tested services use manipulative designs that steer users to allow the gatekeepers to combine the maximum amount of personal data.

These dark patterns can be seen, for example, in the visual design of choice screens, the language used in framing user choices, or the effort required to customise or adjust settings for the combining of data. For example, in the case of Facebook Marketplace, if users opt not to share data with Facebook, a banner appears on the Marketplace homepage saying “You are using the non-personalised version of Marketplace. You can find further information and options here (link).” In this case the link takes users to the option “Change my choice” and then the choice screen (note: wording is a translation of the German-language version. Official English-language wording may differ slightly). However, if the personalised version has already been selected, this banner does not appear on the Marketplace homepage. This makes withdrawing consent to the combining of data more complicated and users are not invited by the banner to make this change.

A similar pattern occurs when users want to customise what data is combined from core platform services or other services, rather than giving general consent to the combining of data. For example, Amazon, Google (Alphabet), and LinkedIn (Microsoft) essentially offer two buttons via which users can consent to or reject the combining of data between several services. Adjusting consent for individual services is only possible via an adjacent link that is not designed as a button¹⁰. Furthermore, all examined services place the option to consent to the combining of data in first place or at the top of the screen, in some cases even highlighting it in colour.

In vzbv’s view, Amazon does not separate the question of consent pursuant to Article 5 (2) (a) clearly enough from the consent to cookies, which can also be regarded as a dark pattern. The choice screen is titled “Cookie and advertising choices”; there are no subheadings in the text, which relates to both cookies and the sharing of data between Amazon services for advertising purposes. The buttons for accepting or declining refer to both aspects, which is also problematic with respect to Article 7 (2) (1) GDPR. You have to click on “customise” next to the decline button in order to differentiate between the different forms of consent. Due to the familiarity of the cookie banner, vzbv believes that many users interpret this choice screen as referring purely to consent to cookies.

¹⁰ The links are termed “additional options” (LinkedIn (Microsoft) and Google (Alphabet)) or “customise” (Amazon).

Figure 1: Amazon choice screen

Cookie- und Werbeeinstellungen

Wenn du zustimmst, können wir deine persönlichen Informationen von einem dieser [Amazon-Dienste](#) verwenden, um die Anzeigen, die wir dir auf anderen Diensten zeigen, zu personalisieren. Beispielsweise können wir deinen Prime Video-Wiedergabeverlauf verwenden, um die Werbung, die wir dir in unseren Stores oder auf Fire TV zeigen, zu personalisieren. Wir können auch persönliche Informationen verwenden, die wir von Drittanbietern erhalten (wie demografische Informationen).

Wenn du zudem zustimmst, verwenden wir auch Cookies, um dein Einkaufserlebnis in den Amazon-Stores zu verbessern, wie in unserem [Cookie-Hinweis](#) beschrieben. Deine Wahl gilt für die Verwendung von Werbe-Cookies von Erstanbietern und Drittanbietern für diesen Service. Cookies speichern oder greifen auf Standardgeräteinformationen wie eine eindeutige Kennung zu. Die [103 Drittanbieter](#), die auf diesem Dienst Cookies verwenden, tun dies zu ihren Zwecken, um personalisierte Werbung anzuzeigen und zu messen, Einblicke in die Zielgruppe zu gewinnen und Produkte zu entwickeln und zu verbessern.

Wir verwenden jedenfalls Cookies und ähnliche Tools, die erforderlich sind, um dir das [Tätigen](#) von Einkäufen zu ermöglichen, dein Einkaufserlebnis zu verbessern und unsere Dienste bereitzustellen, wie in unserem [Cookie-Hinweis](#) beschrieben. Wir verwenden diese Cookies auch, um zu verstehen, wie Kunden unsere Dienste nutzen (z. B. durch Messung der Websiteaufrufe), damit wir Verbesserungen vornehmen können. Klicke auf „Ablehnen“, um abzulehnen, oder auf „Anpassen“, um detailliertere Werbeoptionen zu treffen oder mehr zu erfahren. Du kannst deine Auswahl jederzeit ändern, indem du [Cookie- und Werbeeinstellungen](#) besuchst. Um mehr darüber zu erfahren, wie und zu welchen Zwecken Amazon persönliche Informationen (wie den Bestellverlauf im Store oder den Prime Video-Wiedergabeverlauf) und Cookies verwendet, besuche bitte unsere [Datenschutzerklärung](#) und unseren [Cookie-Hinweis](#).

[Anpassen](#)

English Translation:

Cookies and advertising choices

If you agree, we may use your personal information from any of these **Amazon services** to personalize the ads we show you on other services. For example, we may use your Prime Video Watch history to personalize the ads we show you on our Stores or on Fire TV. We may also use personal information we receive from third parties (like demographic information).

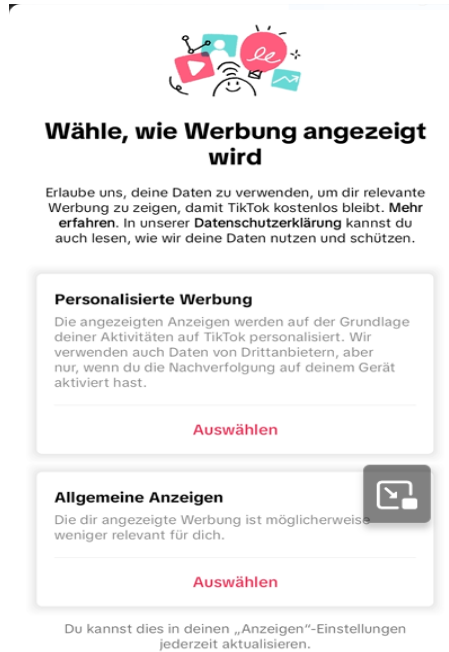
In addition, if you agree, we'll also use cookies to complement your shopping experience across the Amazon stores as described in our **Cookie notice**. Your choice applies to using first-party and third-party advertising cookies on this service. Cookies store or access standard device information such as a unique identifier. The **103 third parties** who use cookies on this service do so for their purposes of displaying and measuring personalised ads, generating audience insights, and developing and improving products.

In any case, we use cookies and similar tools that are necessary to enable you to make purchases, to enhance your shopping experiences and to provide our services, as detailed in our **Cookie notice**. We also use these cookies to understand how customers use our services (for example, by measuring site visits) so we can make improvements. Click "Decline" to reject, or "Customise" to make more detailed advertising choices, or learn more. You can change your choices at any time by visiting **Cookies and advertising choices**. To learn more about how and for what purposes Amazon uses personal information (such as Store order history or Prime Video Watch history) and cookies, please visit our **Privacy notice** and our **Cookie notice**.

Accept Decline Customise

The language that the tested platforms use on their choice screens is also striking. They do not refer to the DMA or other data protection issues, but rather stress user convenience. TikTok (ByteDance) plays on users' fears that the social network may cease to be free of charge if users do not consent to the combining of data. "Allow us to use your data to show you relevant ads, which helps keep TikTok free."

Figure 2: TikTok choice screen



English translation:

Choose how ads appear

Allow us to use your data to show you relevant ads, which helps keep TikTok free. **Learn more.** You can also read how we use and protect your data in our **data privacy policy**.

Personalised ads

The ads shown are personalised based on your activity on TikTok. We also use data from third parties, but only if you have activated tracking on your device.

Select.

General ads

The ads shown may be less relevant to you.

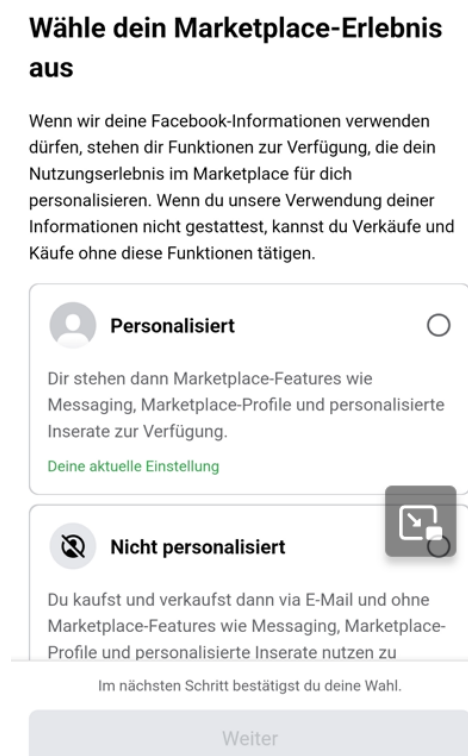
Select.

You can change this at any time in your “Ads” settings.

Meta suggests in various services that consent to the combining of data is merely a question of user experience (“Gaming experience”, “Marketplace experience”, etc.¹¹). LinkedIn (Microsoft) also refers to “user experience”.

¹¹ Linking of Facebook and Facebook Gaming Play and/or Marketplace.

Figure 3: Facebook Marketplace choice screen



English translation:

Choose your Marketplace experience

If you allow us to use your Facebook info, you will have access to functions that personalise your Marketplace experience. If you don't allow us to use your info, you can buy and sell without these functions.

Personalised

You'll have Marketplace features such as messaging, Marketplace profiles, and personalised listings.

Your current setting

Non-personalised

You can buy and sell via email and without Marketplace features such as messaging, Marketplace profiles, and personalised listings

You'll confirm your choice in the next step.

Continue

At the same time, some choice screens are designed to encourage users to maintain the status quo, in other words to continue to permit data sharing between services used. Google (Alphabet), for example, asks users whether they would like to “keep [existing Google accounts] linked” to Google services. LinkedIn (Microsoft) uses similar wording. Such phrasing may prevent users from changing settings (an aversion to losing or changing services), which vzbv considers a possible violation of Article 13 (6).

3. LACK OF EQUIVALENCE IN THE CASE OF LESS PERSONALISED SERVICE

Recital 36 states that users ought to receive a less personalised but nevertheless equivalent service if they do not consent to the combining of data from different services. With respect to Google (Alphabet), for example, it is difficult to judge the equivalence of different versions of the core platform services offered. The company warns that “some functions that involve the sharing of data between different Google services are limited” when services are not linked.¹² However, it is not clear exactly which functions are affected.

In specific cases, the equivalence of the less personalised core platform service is in doubt, as users have to forego core elements of the respective service or use of the services is made significantly more difficult.¹³ The less personalised version of Facebook Marketplace allows contact with other buyers and sellers only via email, and not via Facebook Messaging. In addition, users have no Marketplace profile and cannot see the Marketplace profiles of other users. Facebook Messenger, for example, does not allow users to import old chats if they do not link Messenger to their Facebook account.

¹² Alphabet’s Compliance Report, p. 13, also states the following: “If a user has rejected cross-service end user personal data sharing and this causes a feature or function not to work or not to work properly, Google may inform the user that they can review their consent choices in their account settings to address this.” See <https://transparencyreport.google.com/report-downloads> (last accessed: 20/06/2024).

¹³ vzbv did not examine Meta Ads as part of the current test. It presents the additional problem that users must have a paid subscription for less personalised ads. In a preliminary finding dated 01/07/2024, the European Commission identifies a failure to comply with the DMA, see https://ec.europa.eu/commission/presscorner/detail/de/ip_24_3582 (last accessed: 03/07/2024).

II. FINDINGS OF THE EVALUATION OF ARTICLE 5 (8) (BAN ON BUNDLING SERVICES)

Article 5 (8) prohibits gatekeepers from bundling the use of core platform services with specific other services from the same company. In particular, the companies may not require users to subscribe to or register with other core platform services¹⁴ offered by the same company if they wish to use, access, sign up for or register with a core platform service.

vzbv assessed implementation of the rule with respect to a total of 14 consumer-relevant services offered by four gatekeepers (Alphabet, Apple, Meta, and Microsoft).¹⁵

1. FACEBOOK MARKETPLACE AND FACEBOOK CLOSELY LINKED

vzbv took a close look at Meta's core platform services Facebook Messenger and Facebook Marketplace. The findings show that while Facebook Messenger can, generally speaking, be used as an independent service, the use of Facebook Marketplace is still closely linked to Facebook.

Both the app and browser versions require registration to use Facebook Messenger. Meta allows users to set up a Messenger account with or without a Facebook account. When a new account is being set up a choice screen appears and explains the two options. No serious dark patterns were in evidence here.¹⁶

Facebook Marketplace, in contrast, can only be used in a very limited form without a Facebook account. Meta does not offer the service as an independent app, instead it is integrated in the Facebook app. Certain Facebook Marketplace content can be displayed in the browser version. For example, you can see existing offers and filter by place and additional criteria without logging in. However, logging in or creating a Facebook account is necessary in order to create a new listing or contact a seller. Marketplace does not provide the option of creating a user account without a Facebook account.

In its DMA Compliance Report, Meta claims that a Facebook login screen has been removed from Marketplace in both the desktop and mobile web versions.¹⁷ However, when vzbv tested the service, as a non-logged-in user you were repeatedly requested by Facebook Marketplace to either log in to Facebook or create a Facebook account. The desktop version displayed a website banner and login window containing statements such as "See more on Facebook" and "Activate Marketplace". In some cases, these large banners hid some content and could not be removed by clicking. In

¹⁴ This also applies to services that are not actually designated as core platform services, but nevertheless reach a certain threshold value. Cf. Article 3 (2) (b): the service must have, in the last financial year, at least 45 million monthly active end users in the EU and at least 10,000 yearly active business users.

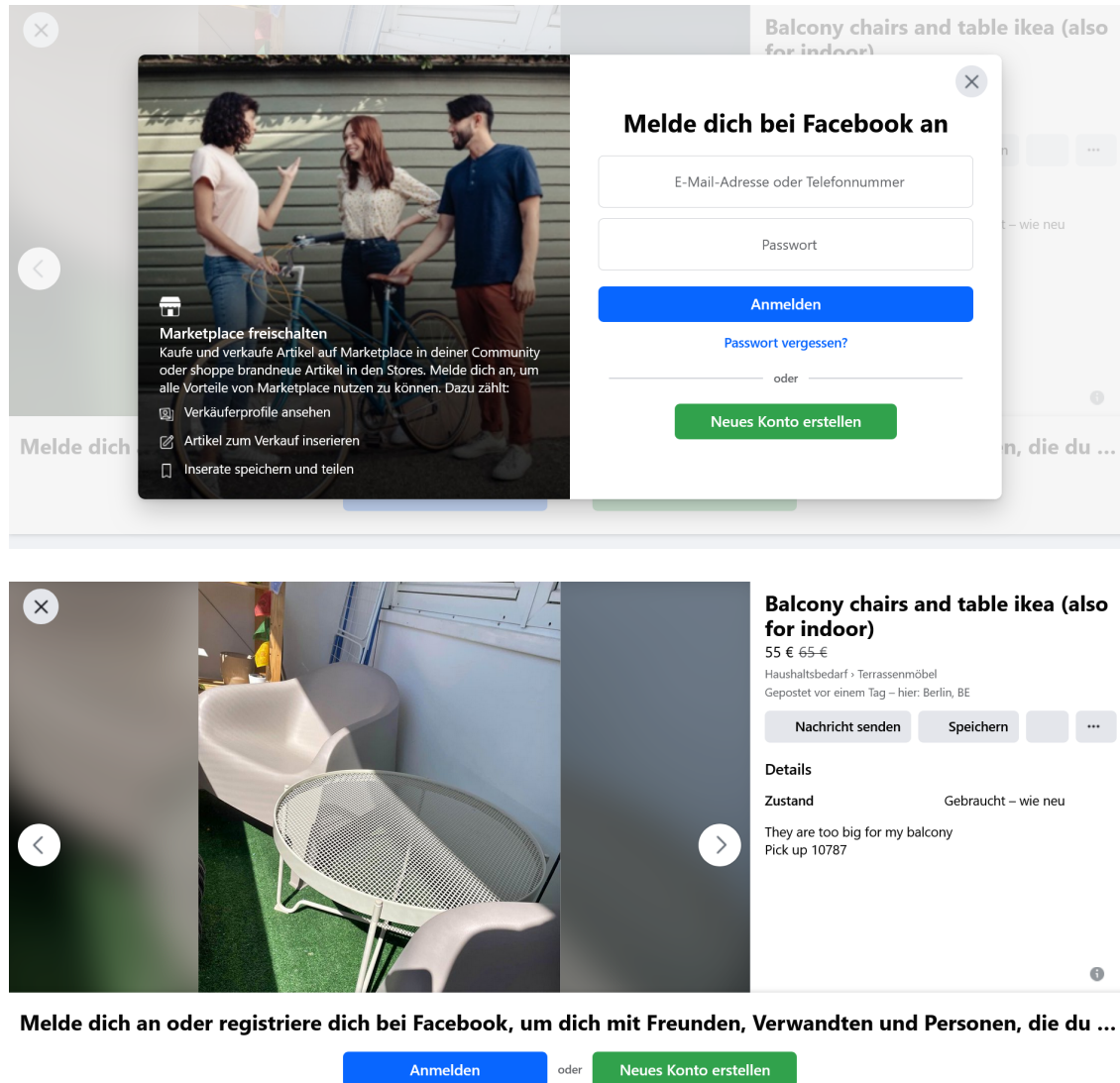
¹⁵ See annex for details.

¹⁶ Both options are presented in an equivalent manner on the choice screen from a design perspective, although the option of using Messenger with a Facebook account is mentioned first.

¹⁷ Cf. <https://transparency.fb.com/sr/meta-compliance-report-2024> (last accessed: 17/06/2024), p. 28.

vzbv's view, these practices could also be seen as violating the ban on circumvention as set out in Article 13 (6).

Figure 4: Requests to log in to Facebook Marketplace



English translation:

Unlock Marketplace

Buy and sell in your community on Marketplace, or shop for brand-new items delivered from stores. Log in to unlock the full benefits of Marketplace, including:

View seller profiles

List items for sale

Save and share listings

Log in to Facebook

Email address or phone number

Password

Log in

Forgotten password?

or

Create new account

Log in or sign up for Facebook to connect with friends, family and people you know.

Log in or Create new account

Although Marketplace was designated as a core platform service and thus must not be bundled with Facebook, Meta offers no option for full use of the service without a Facebook account. Rather, the company forces users who want to buy or sell products on Marketplace to log in with a Facebook account. In vzbv's view, Facebook Marketplace is de facto unusable without a Facebook account.

2. THREADS NOT SUBJECT TO BAN ON BUNDLING SERVICES – BUT STANDS OUT IN THE TEST

vzbv also looked at Meta's Threads service – even though it is not currently considered a core platform service and thus not subject to the ban on bundling services under Article 5 (8) DMA.¹⁸

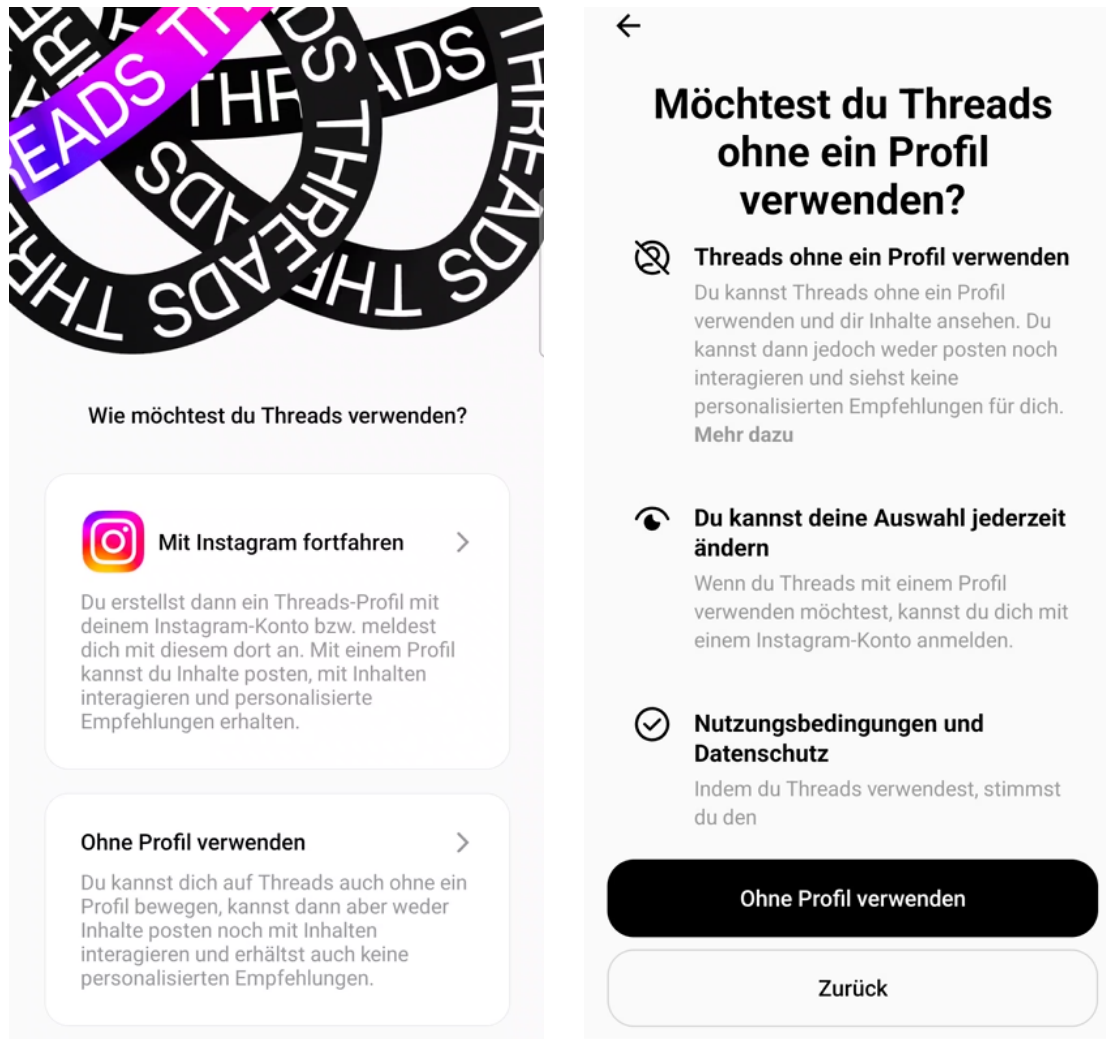
When assessing Threads, the close link to the core platform service Instagram stood out. Directly after the Threads app was installed, a choice screen appeared asking whether the user wishes to “continue with Instagram” or “use [Threads] without a profile”. If you choose “without a profile”, the options for use are very limited. This is similar to how Facebook Marketplace implements Article 5 (8). When vzbv tested the service without an account, Threads could only be used to read posts from other users and search for other profiles. It was not possible, however, to search for content/posts on the platform, to like or comment on posts, to follow profiles, or to post one's own content. Also noteworthy is that it was not possible to create a new user account within the Threads app. The only option was to log in using an existing Instagram account.¹⁹

Even if Threads, as a relatively new service, is not yet subject to the obligation set out in Article 5 (8), vzbv takes a critical view of the way it is tied to Instagram, not least in light of Meta's strong market position. As a result of its close link to Instagram, Threads could quickly attract many users and thus possibly distort competition.

¹⁸ Threads was launched in the EU in December 2023, i.e. after the European Commission designated the gatekeepers and their core platform services. Cf.: <https://www.tagesschau.de/wirtschaft/technologie/threads-twitter-x-zuckerberg-musk-faq-100.html> (last accessed: 20/06/2024). Although specific numbers are not presently available, it can be assumed that by now the service has many users in the EU. Globally, for example, Threads had more than 150 million monthly active users in April 2024, cf. <https://www.heise.de/news/Threads-von-Meta-hat-jetzt-150-Millionen-monatlich-aktive-User-9698056.html> (last accessed: 20/06/2024).

¹⁹ A help text inside the Threads app claims “You can create a Threads profile at any time by clicking on log in in the top right corner”. However, vzbv was unable to confirm this in the test. Meta claims that Threads is not a distinct service as defined by the DMA, but rather part of Instagram. vzbv would question this stance, particularly as Threads has its own app and website and thus appears as an independent social networking service.

Figure 5: Threads choice screen and options for use without a profile.



English translation:

How would you like to use Threads?

Continue with Instagram

Log in or create a Threads profile with your Instagram account. This will let you post and interact with content and see personalised recommendations.

Use without a profile

You can browse Threads without a profile, but you won't be able to post or interact with content. You also won't get see personalised recommendations.

Use Threads without a profile?

Using Threads without a profile

You can use Threads without a profile to browse content, but you won't be able to post, interact or see recommendations for you. Learn more

You can change your choice at any time

If you want to use Threads with a profile, you can log in with an Instagram account.

Terms and privacy

By using Threads, you agree to the ...

Use without a profile

Go back

3. APPLE AND GOOGLE USER ACCOUNTS THAT BUNDLE SERVICES

The tested services from Google (Alphabet) and Apple are not directly bundled with one another. However, to make full use of the services, a Google account or Apple ID that encompasses various services is required, which at least raises questions regarding the ban on bundling services.

Registering with a Google account is the only option available for Chrome, Google Android, Google Maps, Google Play, Google Shopping, Google Search, and YouTube. For example, it is not possible to create a YouTube account without also gaining access to Google Maps or Chrome with the same account. It is possible to use parts of the services without an account. However, the extent of use varies widely. While, for example, Google Search and Google Shopping can generally be used without a user account, a Google account is required to be able to download apps from Google Play.

It is a similar situation with the App Store, iOS and Safari. The services can be used with the same Apple ID and login is required for full use. Logging in or creating an Apple ID is essential when setting up an iPhone for use. This user account then automatically signs you in to all three services. The only alternative is to subsequently use the iPhone and App Store settings to log out and continue using a limited version of the services.

Even though Apple ID and Google accounts are not considered core platform services under the DMA, vzbv questions the degree to which various services from Alphabet and Apple are bundled with a user account encompassing multiple services.

With respect to Microsoft vzbv tested the core platform service LinkedIn. Nothing in particular stood out regarding Article 5 (8).²⁰

²⁰ The test confirmed that a user account is required if you wish to use the service in the LinkedIn app. However, there is no apparent link to other Microsoft services such as Windows, Outlook.com, Edge, or Bing. The browser version of LinkedIn also allows you to access certain content without logging in with a user account.

III. ANNEX: OVERVIEW OF TESTED SERVICES AND GATEKEEPERS

1. TESTED COMBINATIONS OF SERVICES WITH RESPECT TO ARTICLE 5 (2)²¹

Gatekeeper	Core platform service	Other gatekeeper service(s)	Third-party services
Alphabet	Google Search/YouTube/Google Play/Google Maps/Google Shopping/Chrome		
Amazon	Amazon Marketplace	Alexa/Amazon device services (including Amazon Appstore, Silk browser, Amazon Kids/Kids+, Amazon Photos)/ Amazon entertainment services (including Audible, Games, IMDb, Kindle eBooks, Twitch)/ Shopbop/ AbeBooks/Amazon Business	
Apple	App Store		Third-party apps in the App Store
ByteDance²²	TikTok		Data from third-party service providers ²³
Meta	Facebook	Facebook Gaming Play	
	Facebook/Instagram		

²¹ All services within one row were tested with respect to data sharing based on the choice screens, meaning for example between Google Search and YouTube, Amazon Marketplace and Alexa, etc.

²² ByteDance is a special case, as the European Commission named only one core platform service from this gatekeeper. The link between TikTok and CapCut was not assessed.

²³ The identity of the third parties was not clear from the test.

Gatekeeper	Core platform service	Other gatekeeper service(s)	Third-party services
	Facebook/Messenger		
	Facebook/Marketplace		
	Instagram	(Threads) ²⁴	
Microsoft	LinkedIn	LinkedIn Jobs/LinkedIn Marketing Solutions/LinkedIn Learning	

2. SERVICES TESTED WITH RESPECT TO ARTICLE 5 (8)

Gatekeeper	Core platform service
Alphabet	Chrome
	Google Android
	Google Maps
	Google Play
	Google Shopping
	Google Search
	YouTube
Apple	App Store
	iOS
	Safari
Meta	Facebook Marketplace
	Facebook Messenger
	(Threads) ²⁵
Microsoft	LinkedIn

²⁴ See fn. 19 for more on how Threads may qualify as an independent service.

²⁵ The European Commission has not designated Threads as a core platform service. See fn. 18 and 19 for more details on the independent nature of the service.