



Google's commitments to the European Consumer Protection Cooperation authorities

Factsheet | January 2023

Following a dialogue with the European Commission and national consumer authorities, Google committed to changes in its commercial and contractual practices as regards Google Store, Google Play Store, Google Flights and Google Hotels.

The implementation of the commitments and of any requested changes is monitored by each Member State authority as slight differences can exist in different language versions.

Concerns raised by European Consumer Protection Cooperation authorities	Explanation	Changes agreed by Google
Transparent communication on Google Play Store and Google Store		
<p>The procedure in place for consumers to contact Google Play Store and Google Store was complicated and lengthy. There wasn't any electronic link to the ODR platform nor any electronic address to be used on the platform itself.</p>	<p>Information about the trader (such as legal name, the entity address, registration and VAT number) should be easily accessible for consumers. In case Google acts as a trader, consumers should be provided with effective means to contact the company and with an electronic link to the ODR platform.</p>	<p>For Google Play Store, Google will include a live telephone agent support and the necessary contact information will be made more visible. For Google Store, information on the trader will be included in the 'About Google Store' page. Google will include links to the ODR platform (and an e-mail address) on both stores.</p>
Clear pre-contractual information on Google Play Store and Google Store		
<p>Information on delivery costs, delivery restrictions and means of payment was not provided in a clear way to consumers or were missing.</p>	<p>The information on products and services which is key for consumers before the conclusion of the contract (pre-contractual information) must be provided in a clear way to consumers.</p>	<p>Google committed to provide clear pre-contractual information in the FAQ section with a link to the FAQ in the footer of the Google Store.</p>
<p>Information about interoperability of digital content was not always included on the Google Play Store.</p>	<p>Information on interoperability should be provided for all applications in a clear and comprehensive way before the consumer is bound by the contract.</p>	<p>Google committed to include information on the required Android OS version on the app detail pages.</p>

Concerns raised by European Consumer Protection Cooperation authorities	Explanation	Changes agreed by Google
<p>Consumers were not requested (e.g. box to tick) to express their consent and acknowledgement that they would lose their right of withdrawal, in case of an in-app purchase through Google Play.</p> <p>Google Store did not either provide the required information on the 14-day right of withdrawal.</p>	<p>Consumers should expressly consent to and acknowledge exceptions to the right of withdrawal on Google Play Store.</p> <p>It is obligatory to include the information on the right of withdrawal on Google Store.</p>	<p>Google committed to create a dedicated withdrawal waiver screen for Google Play Store and will ensure that a customer's legal 14-day right of withdrawal is mentioned on Google Store alongside its commercial 15-day return policy.</p>
<p>The required information on the existence of a legal guarantee for conformity of goods was not provided on Google Store.</p>	<p>Traders are required to provide a reminder of the existence of a legal guarantee of conformity for goods.</p>	<p>Google will include the necessary information in Google Store Terms of Sale and in the general Terms of Service.</p>

Geo-blocking with respect to payment means on Google Store in another country

<p>Google applied payment restrictions for users trying to use Google Store in another country version, preventing the use of payment means of the same brand and type of those generally accepted, but of a different "nationality" than that of the "payment profile".</p>	<p>Based on Geo-blocking Regulation¹, no payment restrictions should be applied for reasons related to a customer's nationality, place of residence or place of establishment, the location of the payment account, etc. This includes the possibility that all users (guest and registered users) should be able to pay and place an order in another Member State with any payment means accepted by the trader, without prior registration of other payment means in addition to the one used for the purchase.</p>	<p>Google commits to ensure that both guest and registered users of Google Store can use any payment means for purchases in any EEA country.</p>
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Geo-blocking on downloading content from Google Play Store of another country

<p>Google did not allow consumers to browse national versions of the Google Play Store other than that in which the consumer is registered. Moreover, Google makes it difficult for consumers to switch to another national version so they can use and download content from Google Play Stores. Google only allowed consumers to change their chosen country version once a year and the credit already acquired could not be used since it is linked to the previous Play Country.</p>	<p>Based on the Geo-blocking Regulation² a trader will not, through the use of technological measures or otherwise, block or limit a customer's access to some versions of the trader's online interface for reasons related to the customer's nationality, place of residence or place of establishment.</p> <p>Moreover, Google offers hosting services for apps, which are a form of electronically supplied services. Those should not either be subject to restrictions due to the "nationality" of accounts of the users who try to download them.</p>	<p>Google commits to explain clearly to consumers how, and to enable them to browse content from Google Play Stores of other EU countries through its web version.</p> <p>Moreover, Google commits to provide, in a prominent way, information on the Geo-blocking Regulation to developers, in order to inform them that their apps should be accessible EU-wide unless a specific exception of the Regulation can be relied upon.</p> <p>Nevertheless, Google failed to remove restrictions to the use of different national versions of its platform. This will still prevent consumers from downloading content hosted in the Google Play Store of another EU country, even when such content should be accessible to them, such as in the case of cross-border travellers and tourists.</p>
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¹ Regulation (EU) 2018/302 of the European Parliament and of the Council of 28 February 2018 on addressing unjustified geo-blocking and other forms of discrimination based on customers' nationality, place of residence or place of establishment within the internal market and amending Regulations (EC) No 2006/2004 and (EU) 2017/2394 and Directive 2009/22/EC (Text with EEA relevance), *OJ L 601*, 2.3.2018, p. 1–15.

² *Idem*.

Concerns raised by European Consumer Protection Cooperation authorities	Explanation	Changes agreed by Google
Clarity about business model of Google Flights and Google Hotels		
<p>The role of Google on Google Flights and Google Hotels was not always clear, specifically whether consumers contract directly with Google or with the flight company/hotel through Google.</p>	<p>Clear information is required on the company's business model, including on whether Google sells directly to consumers or whether flight company/hotel sells via Google.</p>	<p>Google presents their business model clearly, thanks to a new tool kit included next to the booking options as well as a clearer "Learn more" section. The new disclosures helped consumers understand, when they make a booking, that they are contracting directly with the flight or hotel company and not with Google (as the possibility to book flights or hotels via Book on Google has been deprecated).</p>
Clear information on final prices on Google Flights and Google Hotels		
<p>Google's practices (price presentation, price evolution tool) misled consumers as to the final price of a flight on Google Flights.</p>	<p>Traders should provide information on final price to consumers i.e. price including all applicable charges and taxes which are unavoidable and foreseeable when the offer is presented without having to consult the website of a Google Flights' partner.</p>	<p>Google will adapt the wording, the visibility and the placement of information regarding prices. It will also change the price evolution tool.</p>
<p>Prices displayed on Google Hotels were not the final prices consumers would be asked to pay, as they did not include all applicable charges and taxes. The calculation of price advantages was not clear either and could mislead the consumer.</p>	<p>Traders should provide the final price to consumers, i.e. price including all applicable charges and taxes which are unavoidable and foreseeable when the offer is presented. Google should provide clear information on the calculation of price advantages, in particular on the reference price used to calculate the discount.</p>	<p>Google committed to make all possible efforts to ensure that the prices it displays to consumers are as accurate as possible. Google will change the wording of the badge 'Deal' to another wording to better explain the price advantage. The percentage discount will be removed to avoid suggesting a direct comparison to another price.</p>

Concerns raised by European Consumer Protection Cooperation authorities	Explanation	Changes agreed by Google
Reliability of online reviews on Google Hotels		
<p>Google misled consumers as to the source of reviews posted on Google Hotels, as it led consumers to think that the reviews were from real users, which could not be ascertained by Google.</p>	<p>Traders should provide truthful information on their services including on the reviews. If Google cannot ensure that reviews come from real users it should inform consumers accordingly.</p>	<p>Google will provide more information about how they collect reviews. They will also make it clear that they do not verify reviews on Google Hotels.</p>
Transparency of search results on Google Hotels		
<p>It was not clear to consumers how search results were ranked.</p>	<p>Consumers must be clearly informed on how the search results are ranked and how the ranking may be influenced by payments made by accommodation providers or intermediaries.</p>	<p>Google will provide a tooltip at the top of the results including details on the ranking, as well as a link for more information about ranking of the search results.</p>
Improved procedure for removal of illegal content		
<p>Google did not provide effective means to flag illegal content in Google Search (including for CPC Authorities) and for its speedy removal.</p>	<p>Google must reply timely to requests for takedown of illegal content and must ensure that the illegal content is removed swiftly upon request.</p>	<p>Google commits to provide more effective means for removing illegal content. They will also create an e-mail address that allows the CPC Network of Authorities to directly contact Google, report and request the quick removal of illegal content from Google platform.</p>