



A benchmark analysis of the 2026 Digital Markets Act Audit & Compliance Reports

KPMG the Netherlands

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DMA compliance evolves incrementally across obligations, gatekeepers and enforcement

Our 2026 Digital Markets Act (DMA) Comparative Benchmark Analysis tracks gatekeepers' DMA compliance approaches and profiling techniques and how they evolve over time with the aim of answering one single question: What has changed compared to last year and what does this tell us about regulatory focus and compliance maturity in gatekeepers' reporting?

Scope

The benchmark analysis is based on:

- **Compliance Reports (DMA, Article 11):** how gatekeepers design, explain, and update their compliance measures and broader compliance approaches.
- **Audit Reports (DMA, Article 15):** how gatekeepers describe and structure their audited profiling reports.
- **EC Enforcement:** how the European Commission's (EC) enforcement activity develops over time and how it relates to reported compliance measures.

Approach

The benchmark focuses on **changes at:**

- DMA obligation / subarticle level;
- gatekeeper level.

It **compares** Compliance and Audit Reports:

- across reporting cycles;
- across gatekeepers.

It further analyses **the EC's enforcement** to:

- link changes to enforcement actions;
- identify enforcement-driven updates.

Insights

The benchmark analysis presents:

- **Updates.** Individual (per gatekeeper) changes and developments in reported compliance measures and approaches.
- **Trends.** Recurring patterns and key themes emerging across gatekeepers and across reporting cycles.
- **Enforcement impact.** Shifts in gatekeepers' compliance approaches that are driven by the EC's enforcement actions.

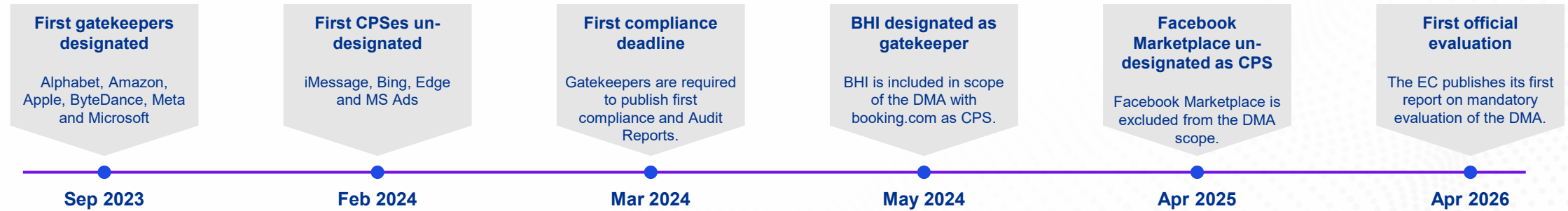
Key conclusion: Change is incremental and selective; most updates target specific DMA obligations and are often driven by enforcement pressure.

01 Recap of the DMA



Since 2023, the scope of the DMA has shifted, changing which gatekeepers and CPSEs are included in this benchmark report

The DMA applies to Core Platform Services (CPSEs) provided by undertakings designated as gatekeepers by the European Commission to business or end users established or located in the EU and are subject to ex ante obligations to ensure fair and contestable digital markets. Since the DMA became applicable in 2023¹, the scope of designated gatekeepers and CPSEs has evolved through several designation and undesignation decisions. The timeline below highlights the key scope-defining moments relevant for interpreting the benchmark analysis results.



Scope snapshot: 2023: 6 gatekeepers and 22 CPSEs | 2025: 7 gatekeepers and 23 CPSEs

Gatekeepers and CPSEs currently in scope



1. DMA legal lifecycle: legal adoption (Sep 2022) → entry into force (Nov 2022) → applicability (May 2023)

Comparing gatekeepers' reports year over year reveals changes in compliance and profiling approaches

KPMG performed a structured benchmark analysis of publicly available gatekeeper reports from 2026 under the Digital Markets Act. Our analysis focuses specifically on **changes** applied by gatekeepers to their compliance measures and profiling approaches in reporting year 2025 compared to reporting year 2024 and is structured around DMA obligations under which such updates or developments were observed. The analysis combines **cross-gatekeeper** and **year over year** perspectives to assess how information is presented, structured and how it has evolved over time along with interpretive insights based on these reports.

Compliance Report (Article 11 of the DMA)

Article 11 of the DMA requires designated gatekeepers to publish annual Compliance Reports describing the measures implemented to ensure adherence to the DMA's obligations and prohibitions across their designated CPSEs.

These reports are used in this benchmark analysis to assess how gatekeepers interpret regulatory requirements, explain compliance measures, and present structural or organizational changes introduced to align with the DMA.

For most gatekeepers, this benchmark analysis is based on 2026 Compliance Reports. However, for BHI, the 2025 Compliance Report is used, as BHI was designated as a gatekeeper at a later stage and the 2026 Compliance Report was not yet available at the time of the benchmark analysis.

Audit Report (Article 15 of the DMA)

Article 15 DMA requires designated gatekeepers to annually submit and publish an independently audited description of the consumer profiling techniques applied within their Core Platform Services.

This benchmark analysis reviews Article 15 reporting across gatekeepers to understand how profiling techniques are described and structured, including differences in granularity, categorization, and transparency.

Based on this review, reports are assessed and grouped according to recurring patterns in how information is presented. These groupings are then visualized using a matrix to illustrate key differences in reporting approaches, with each quadrant reflecting distinct positioning observed across gatekeepers.

The assessment primarily draws on 2026 Audit Reports. For BHI, the 2025 report is used, due to its later designation and the absence of a 2026 report, while for Apple no publicly available audit report could be identified.

DMA compliance reporting converges around clear patterns and year over year trends across gatekeepers

Across Article 11 Compliance Reports, some patterns emerge: gatekeepers are **converging** around targeted updates, stronger governance, evidence-based monitoring, more standardized reporting and increasing alignment with Commission feedback and enforcement.



Concentrated changes in specific obligations and gatekeepers

Most notable updates from reporting year 2024 to 2025 were changes to anti-steering requirements, user default settings and interoperability **concentrated in a limited set of subarticles** (e.g., 5(2), 5(4), 6(2), 6(3), 6(4), 6(7), 6(9) and 6(10)) and were primarily reported by a small **subset of gatekeepers**. This concentration overlaps with gatekeepers subject to active **supervisory scrutiny**.



Strengthened compliance governance

DMA compliance governance shifted from project-based arrangements to **permanent, senior-level functions**. By the second year of application, all gatekeepers described dedicated compliance functions carried out by senior officers with **defined authority, resources, and escalation lines** to senior management or the management body.



Active monitoring supported by evidence and metrics

Compliance narratives increasingly emphasized **ongoing monitoring** and **evidence** of effectiveness. Compared to 2025, 2026 reports more **frequently referenced controls, internal audits, KPIs or usage metrics** (e.g., adoption of choice screens or opt-out flows), indicating a shift from describing measures to demonstrating how they operate in practice.



Responsiveness to regulatory feedback and enforcement

Reported compliance measures increasingly evolved following **Commission feedback, investigations** and early enforcement experience. Many gatekeepers explicitly referenced regulatory engagement as a **trigger for updates** to interfaces, policies, or processes, marking a shift from untested measures to compliance approaches shaped by active supervisory interaction.



Standardized and more transparent reporting

By 2026, all gatekeepers significantly **expanded and standardized** their Article 11 Compliance Reports. Reports became more structured, aligned with the Commission's updated template, and **explicitly highlighted year-on-year changes** (e.g., 'summary of changes').

Audited profiling reports differ across gatekeepers with limited, incremental changes over time

Across Article 15 DMA Audit Reports, gatekeepers continue to take **different** approaches, varying in structure, scope and framing, while changes over time are limited to incremental increases in detail.



Template-driven vs. narrative-driven structure

A number of reports closely follow the Commission's audit template structure, creating a section-by-section mapping, while others use a more narrative or customized structure that groups information thematically.



Different scoping choices in public-facing Audit Reports

Gatekeepers appear to make different scoping choices regarding what is included in the public Article 15 report versus referenced at a high level. This affects the breadth of topics explicitly covered and the extent to which reports prioritize completeness versus conciseness.



Changes over time

Year-on-year changes in Article 15 reports primarily reflect incremental increases in detail and refinement, rather than a substantive expansion of scope or shifts in profiling approaches.



High-level consistency with selective deep dives

Across gatekeepers, core framing remains broadly consistent, but the level of detail varies by topic. Certain areas (e.g., purposes of profiling, personal data used, and consent-related elements) are elaborated in more detail, whereas others remain consistently at a high level across reports.



Standardized and more transparent reporting

Some gatekeepers structure their Article 15 reports mainly around generic profiling models or techniques used across services, while others focus more clearly on specific applications or use cases. This structure influences how easily stakeholders can navigate, compare, and trace profiling reports across CPSEs.

02 Enforcement trends

Enforcement is concentrated on interoperability, self-preferencing and anti-steering

Citations of DMA obligations in non-compliance enforcement proceedings² per gatekeeper

Gatekeeper	Article 5(2): Cross-Service Data Sharing	Article 5(4): Anti-steering	Article 5(7): Tying of Ancillary Services	Article 6(3): App Un-installation & Default Settings	Article 6(4): Side Loading	Article 6(5): Self-Preferencing	Article 6(7): Interoperability	Article 6(11): FRAND Access to Search Data	Article 6(12): FRAND Access Conditions	Total citations (not the number of proceedings) ³
Alphabet		1  Google Play				2 	1  android	1 	1 	6
Apple		2 iPadOS 	1 iPadOS	1  iOS	1 iPadOS		3   iPadOS			8
Meta	1 									1

Legend

  = Alphabet's CPS

  = Apple's CPS

 = Meta Platforms Inc.

Numbers indicate how often a DMA obligation was cited in Commission enforcement proceedings for a given gatekeeper. Logos indicate the CPS involved (not the number of citations per CPS). Totals reflect the overall number of citations per gatekeeper (not the number of proceedings). A single proceeding may include multiple obligations and/or CPS and is therefore counted more than once.

Enforcement activity is concentrated on interoperability, anti-steering and self-preferencing obligations. Enforcement to date remains focused on a limited subset of DMA provisions.

- **Alphabet** has been investigated for self-preferencing tied to their search engine (Google Search) promoting its other services, such as Google Shopping, Maps and Flights.
- **Apple shows the highest number of citations**, driven by its OS ecosystem, particularly in relation to interoperability (iOS / iPadOS) and anti-steering in the App Store, which has resulted in a **formal non-compliance decision** under the DMA.
- **Meta** enforcement to date has been narrow in scope, focused on cross-service data sharing without user consent, with a **non-compliance decision** also having been issued.

2. Refers to EC actions assessing potential non-compliance with the DMA (incl. investigations and related RFIs), excluding designation decisions, market investigations and other procedural steps.

3. Counts reflect citations of DMA obligations in enforcement proceedings (not the number of proceedings) and only gatekeepers subject to such proceedings to date (Alphabet, Apple and Meta) are included.

03 Compliance Reports insights

Gatekeepers introduce clearer consent choices and enable external offers with defined conditions

2025-2026 Reporting Cycle Change

Gatekeeper	Article 5(2)	Article 5(3)	Article 5(4)
 Alphabet	--	Centralized transparency page for waiver addressee's.	Google Play launched 'External Offers' program.
 Amazon	--	--	--
 Apple	New consent flow due to introduction of Apple Games.	--	Anti-steering regime implemented.
 Meta	Revised ads choice model.	--	--
 Microsoft	--	--	--
 ByteDance	--	--	--
 BHI	--	--	--

Disclaimer: Article subsections 5(5)-(10) have been left out of the table because none of the gatekeepers reported changes in the 2025-2026 reporting cycle. Additionally, the BHI report examines changes between the 2024 and 2025 reporting cycles, as this is the most recent reporting.

Article 5(2): Prohibition on Cross-Service Data Sharing Without User Consent

- Since the recent **introduction of Apple Games**, Apple implemented new **cross-service data processing and a notice-and-consent flow**. While Apple Games is not designated as a CPS, it has the potential for data-sharing complications.
- Since the **non-compliance decision by the EC** on their 'pay or consent' model, **Meta revised the ads choice** for its EEA users to function as a '**dimmer switch**' for **ad personalization**. Meta now gives users the choice between consenting to share all their data, seeing fully personalized ads, or opting to share less personal data and have less personalized ads.

Insight: Enforcement and new product launches push for more explicit and differentiated user choices for cross-service data use.

Article 5(3): Prohibition on Parity Clauses

- Google launched an informational page (single source of truth or SSOT)** that is easily accessible to **business users**, to allow them to sell their products through a direct online sales channel that can be at a different price point than the online intermediation service.

Insight: Enabling business users to present alternative offers and pricing across channels makes those alternatives easier to communicate and act on.

Article 5(4): Prohibition on Anti-Steering Restrictions

- Alphabet offered **updates in Google Play that allow developers to link to owned app downloads and digital content**. They also changed the transaction fees and introduced a tiered service model distinguishing between initial user acquisitions and an ongoing service fee.
- Apple implemented compliance measures following a Commission's non-compliance decision**, e.g., in-app communication and promotion of alternative offers, actionable steering links, associated reports and a new fee structure.

Insight: External steering becomes a supported interaction in the platform, with fee structures defining the terms under which it can be used.

Non-discriminatory controls, user choice and ranking fairness become embedded in controls and product design

2025-2026 Reporting Cycle Change

Gatekeeper	Article 6(2)	Article 6(3)	Article 6(5)
 Alphabet	--	--	--
 Amazon	--	--	--
 Apple	--	UI Expansion and API Updates: Selection rate per browser app; Installed vs. Pre-Installed breakdown; Product Display Metrics.	--
 Meta	--	--	--
 Microsoft	--	Windows update to allow users to open web content in their default browser instead of Edge.	--
 ByteDance	--	--	--
 BHI	Additional periodic review and trainings to ensure compliance.	--	Conducts internal quarterly reviews on algorithm outputs to ensure no preferential ranking treatment.

Disclaimer: Article subsections 5(5)-(10) have been left out of the table because none of the gatekeepers reported changes in the 2025-2026 reporting cycle. Additionally, the BHI report examines changes between the 2024 and 2025 reporting cycles, as this is the most recent reporting.

Article 6(2): Prohibition of Non-public Data Use in Competition with Business Users

- BHI has strengthened its compliance framework through enhanced **periodic reviews and targeted training programs**, reinforcing internal controls and ensuring consistent adherence to regulatory requirements across operations.

Insight: Non-discriminatory controls become embedded in ongoing internal processes through regular reviews and training.

Article 6(3): User Choice and Default Settings

- Apple has introduced UI expansions and API updates** to enhance transparency and user choice, including granular metrics on browser selection rates, installed versus pre-installed app distribution, and product display performance.
- Microsoft Windows update that allows user choice settings** enables users to open web content directly in their chosen default browser rather than just Edge, reinforcing user autonomy over default application settings.

Insight: User choice over default settings becomes more explicit and easier to act on in practice.

Article 6(5): Prohibition of Self-Preferencing

- BHI conducts **quarterly internal reviews of algorithmic outputs** to ensure the absence of preferential ranking treatment, reinforcing neutrality in content and service prioritization.

Insight: Ranking outcomes are actively reviewed to identify and prevent preferential treatment.

Interoperability, portability and data access become more structured, scalable and integrated

2025-2026 Reporting Cycle Change

Gatekeeper	Article 6(7)	Article 6(9)	Article 6(10)
 Alphabet	--	Pixel data available through Data Portability & Partnership with Apple to streamline iOS-Android device switching.	--
 Amazon	--	--	--
 Apple	Formalization and expansion of interoperability framework: EC time-bound request & internal/external review.		
 Meta	--	Created 'Export Your Information', 'Developer onboarding portal', and updated technical architecture for reports.	--
 Microsoft	--	--	--
 ByteDance	--	Added concrete updates to data portability to DYD with in-depth datasets.	--
 BHI	--	Improved export process allowing users to generate, share, and export links simultaneously & third-party proof-of-business document.	New data access improvements, Help-Me-Reply, and upgraded messaging API.

Disclaimer: Article subsections 6(8)), 6(11), and 6(12) have been left out of the table because none of the gatekeepers reported in the 2025-2026 reporting cycle. Additionally, the BHI report examines changes between the 2024 and 2025 reporting cycles, as this is the most recent reporting.

Article 6 (7): Interoperability requirements

- Apple** is advancing the **formalization and expansion of the interoperability framework** in response to a time-bound European Commission request, with clear governance and delivery milestones. This includes targeted internal and external reviews to ensure alignment, consistency, and effective cross-ecosystem implementation.

Insight: Interoperability moves from ad hoc efforts to a structured and governed implementation process.

Article 6 (9): Granting end-user data portability and access to CPS data

- Alphabet** is expanding **Pixel data portability capabilities** and **partnering with Apple** to streamline cross-platform iOS-Android device switching through improved transfer flows.
- Meta** is enhancing **'Export Your Information' tooling**, and has launched a developer onboarding portal, and upgraded technical architecture to support scalable data access reporting.
- ByteDance** is advancing the **DYD (Download Your Data) functionality** with richer, more granular datasets to improve usability and depth of user data portability.
- BHI** is optimizing **export processes** to enable simultaneous generation, sharing, and retrieval of data links, and introducing third-party proof-of-business verification mechanisms.

Insight: Data portability becomes more scalable and cross-platform, improving how data can be transferred and reused.

Article 6 (10): Granting business users and third parties access to CPS data

- BHI** is introducing **enhanced data access capabilities**, alongside 'Help-Me-Reply' functionality and an upgraded messaging API to support more scalable and automated interactions.

Insight: Third-party data access becomes more automated and scalable through API-based integration.

Interoperability expands beyond basic messaging but remains opt-in and is complex to scale

2025-2026 Reporting Cycle Change			
Gatekeeper	Articles 7(2), 7(4)	Articles 7(3),7(5),7(7),7(9)	Article 7(6)
 Alphabet	--	--	--
 Amazon	--	--	--
 Apple	--	--	--
 Meta	Multiplatform interoperability	Increased scope of interoperability	Extension still in place
 Microsoft	--	--	--
 ByteDance	--	--	--
 BHI	--	--	--

Disclaimer: Article subsections 7(1) has been left out of the table because none of the gatekeepers reported changes in the 2025-2026 reporting cycle. Additionally, the BHI report examines changes between the 2024 and 2025 reporting cycles, as this is the most recent reporting.

Articles 7(2), 7(4): Interoperability in Basic Functionalities of Gatekeeper Services

- Meta's compliance with Article 7 DMA centers **on the development of its WhatsApp Interoperability Solution**, enabling cross-platform messaging between WhatsApp users and third-party providers on an **opt-in basis**. The solution reflects significant investment in technical infrastructure to support interoperability while maintaining high standards of security, safety and privacy.

Insight: Interoperability is introduced on an opt-in basis, requiring users to actively enable cross-platform interactions.

Articles 7(3),7(5),7(7),7(9): Security Safeguards, Interoperability Requests and Data Minimisation

- Meta's compliance with Article 7 DMA reflects an expanded scope of interoperability through solutions for both **WhatsApp and Facebook Messenger, enabling opt-in cross-platform messaging with third-party providers**. These solutions extend functionality, technical integration options, and supported use cases, while maintaining strong safeguards for security, privacy and user control.

Insight: Interoperability extends beyond basic messaging to additional services and integration options, enabling broader cross-platform interactions.

Article 7(6): Implementation timeline adjustment for gatekeepers complying with interoperability.

- Meta has sought a six-month extension under Article 7(6)** to meet interoperability requirements, indicating timeline pressures associated with implementing complex technical solutions at scale.

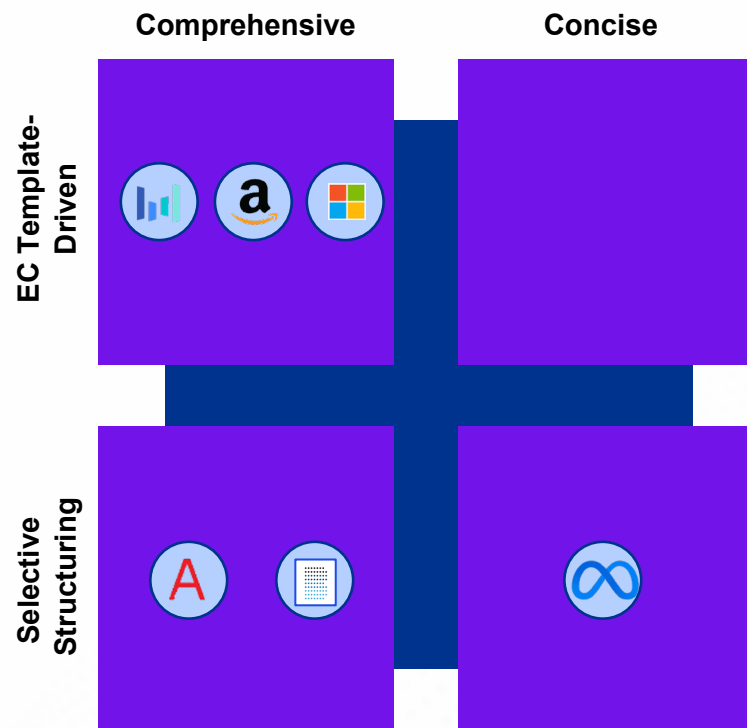
Insight: Interoperability implementation remains complex, requiring additional time to deliver at scale.

04 Audit Reports Insights



Diverging report structures limit traceability to EC template requirements and cross-gatekeeper comparability

Structuring of Profiling Technique Reports



Disclaimer: This matrix is intended solely for qualitative categorization of reporting approaches and does not represent any form of ranking, scoring

Overview: Structuring of Profiling Technique Reports

Across gatekeepers, Article 15 reports follow different structuring approaches. The horizontal axis illustrates how reports relate to the EC template (structured/template-oriented vs. more flexible/concise), while the vertical axis illustrates how contextual detail is incorporated (selective/high-level vs. more comprehensive/detailed).

These reflect **varying balances between providing context and aligning with the regulatory template**. As a result, **differences arise in how easy the reports are to understand, trace, and compare across gatekeepers**. Based on these observations, we grouped the approaches into three categories, based on the matrix shown on the left:

EC template-aligned structuring (Amazon, Microsoft, ByteDance)

Amazon, Microsoft, and ByteDance structured their reports closely in line with the Article 15 template, organizing information according to predefined regulatory categories. This makes it easier for stakeholders to locate how each required element is addressed and supports clear traceability to the regulation.

Structured format (Alphabet, BHI)

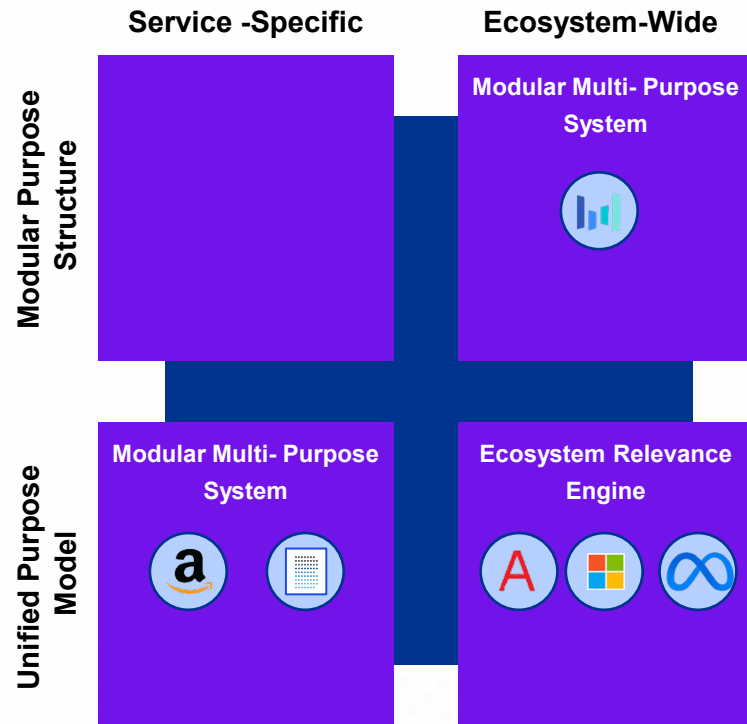
Alphabet and BHI structure their reports broadly in line with the Article 15 template, while incorporating internally defined frameworks. Certain elements outlined in the template are not always presented, resulting in reports that remain well-structured and coherent from a platform perspective. At the same time, the linkage to individual template elements may be less immediately visible.

High contextual and selective structuring (Meta)

Meta organizes its reporting more selectively, focusing on high-level information that they considered most relevant for a public audience. While this approach provides context on how profiling operates within their platform, alignment with predefined Article 15 template elements is less direct.

Gatekeepers position profiling differently, shaping whether it is applied within one service or across multiple services

Positioning: Purpose of Profiling Technique



Disclaimer: This matrix is intended solely for qualitative categorization of reporting approaches and does not represent any form of ranking, scoring

Overview: Positioning of Profiling Technique Purpose

Across gatekeepers, profiling techniques are positioned differently within their platform models. The horizontal axis represents the scope of profiling (from service-specific to ecosystem-wide), while the vertical axis reflects the purpose structure (from unified application to modular).

These differences highlight **how profiling is applied, either as a core functionality within a single service or as a broader mechanism across multiple services and purposes**. As a result, variations can be observed in how the role of profiling is presented across gatekeepers and understood within their platform context. Below is the breakdown of the analysis, based on the matrix shown on the left:

Core service enablement (Amazon, BHI)

Amazon and BHI position profiling primarily as supporting the core functionality of their platforms, such as enabling product discovery and facilitating bookings.

In this model, profiling is closely linked to **transactional and service-specific activities** and is presented as contributing directly to the effectiveness and usability of the core service.

Ecosystem relevance engine (Alphabet, Meta, Microsoft – LinkedIn)

Alphabet, Meta and LinkedIn position profiling as a **general relevance mechanism applied across multiple services and interactions within their ecosystem**.

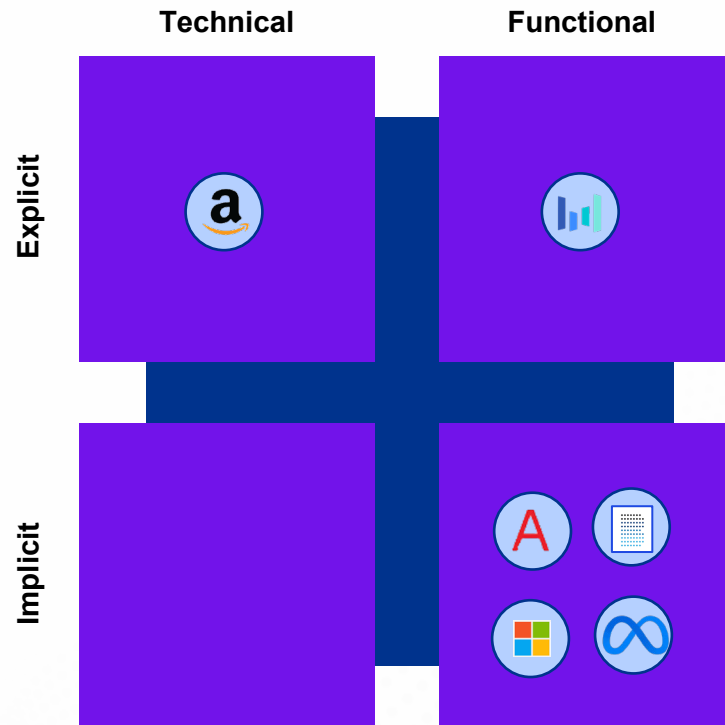
Profiling is described as supporting a wide range of functionalities, including content ranking, user interaction, service personalization, and, where applicable, advertising.

Modular multi-purpose model (ByteDance)

ByteDance adopts a more structured approach by defining profiling across explicit and distinct purpose categories, such as content recommendation, user recommendation, advertising optimization, and platform safety.

Diverging categorization of profiling techniques limit clarity and cross-gatekeeper comparability

Categorization of Profiling Technique



Disclaimer: This matrix is intended solely for qualitative categorization of reporting approaches and does not represent any form of ranking, scoring

Overview: Categorization of Profiling Technique

Across gatekeepers, there is no single harmonized framework for categorizing profiling techniques. While most rely on a combination of rule-based logic and machine learning, they differ in (1) whether this distinction is explicitly articulated or only implicitly reflected in their reporting, and (2) how these techniques are described and grouped. The matrix visualizes this differences in which the horizontal axis represents the type of categorization (technical vs. functional), while the vertical axis reflects how the distinction between rule-based and machine learning techniques is presented (from explicitly defined to implicitly reflected).

Overall, **these differences point to the potential benefits of greater alignment in how profiling techniques are described, to support clarity and comparability across reports**. Below is a breakdown of profiling technique categorization, based on the matrix shown on the left:

Technical categorization (Amazon)

Amazon presents a technical categorization of profiling techniques, explicitly distinguishing between rule-based approaches (based on predefined logic) and model-based approaches (driven by machine learning).

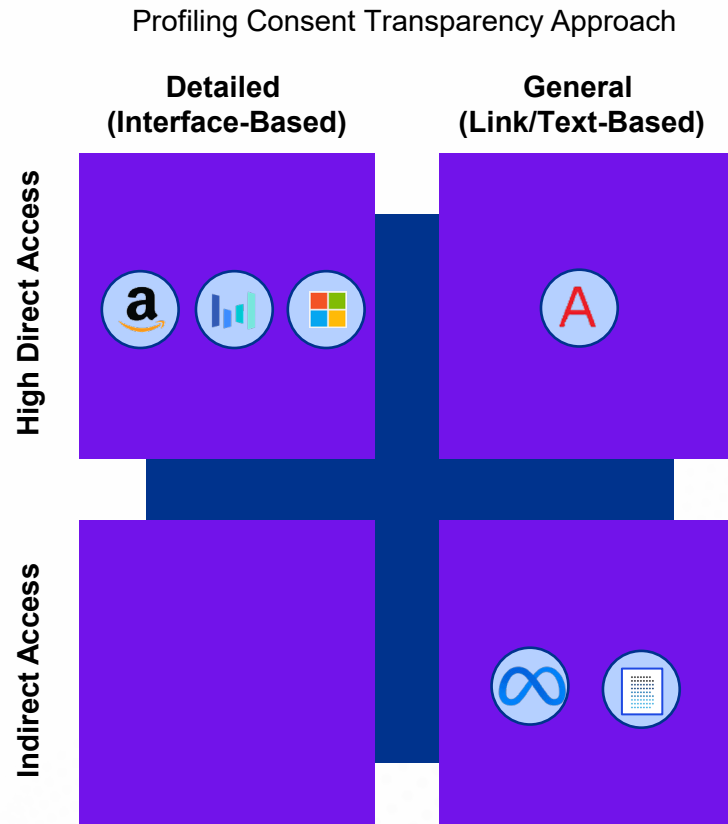
Functional positioning with supporting technical distinction (ByteDance)

ByteDance similarly refers to both machine learning and non-machine learning (rule-based) techniques. However, profiling is primarily organized around functional positioning (e.g., content recommendation, advertising), with technical distinctions included as supporting information.

Functional categorization (other gatekeepers)

Other gatekeepers, including Alphabet, Meta, Microsoft, and BHI, generally describe profiling techniques in relation to functional outcomes (such as advertising, search, or recommendations), without systematically distinguishing between underlying technical approaches.

Gatekeepers present and enable access to profiling consent controls differently, shaping how easily users manage consent



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Overview: Consent Transparency Reports

Across gatekeepers, different approaches are observed in how consent transparency is presented. While all provide information on profiling activities that help users to manage their consent, differences arise in how users can access and exercise control mechanisms and how consent-related information is structured and presented. The horizontal axis represents the type of presentation (from detailed/interface-based → more general link/text-based), while the vertical axis reflects the level of user access (from indirect access → direct access to consent controls).

A more detailed and interface-based presentation of consent mechanisms is associated with enhanced transparency in practice and contributes to how trust and accountability may be perceived from a user perspective. Below is a breakdown of consent transparency reports by gatekeeper, based on the matrix shown on the left:

Detailed and interface-based transparency (Amazon, ByteDance, and Microsoft)

Amazon, ByteDance, LinkedIn adopted a more structured approach to consent retrieval by providing centralized interfaces and step-by-step guidance for managing consent. This supports a more accessible and user-oriented consent experience.

Direct access to consent controls (Alphabet)

Alphabet provides users with direct access points to manage consent through clearly positioned links or entry points and direct navigation to dedicated settings pages where users can configure their preferences.

General information or less direct access (Meta and BHI)

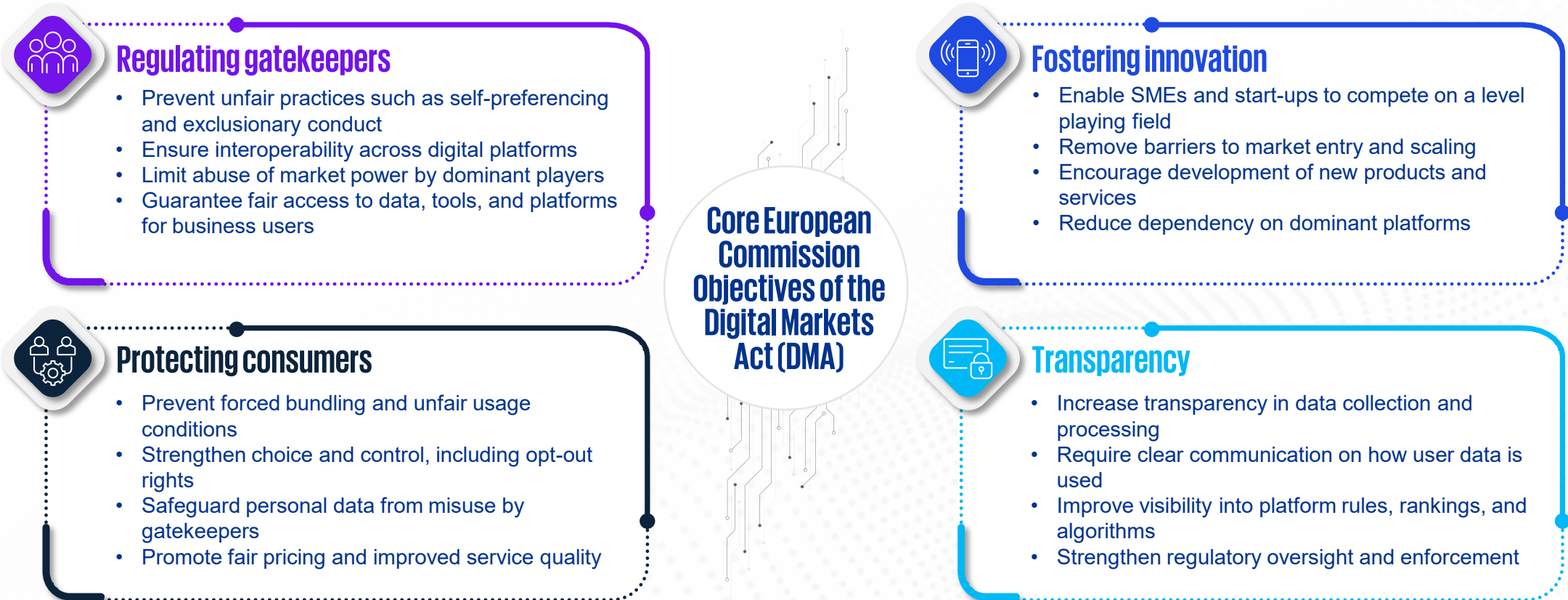
Both Meta and BHI provide information on profiling and consent primarily through general descriptions in the report or via links directing users to their relevant policies. While consent management options are available, the access path to exercising control is less straightforward.



05 Appendix

The DMA regulates gatekeepers to promote fair and transparent digital markets

The Digital Markets Act (DMA) is an EU regulation designed to ensure fair competition, innovation, and consumer protection in digital markets. It targets large digital platforms designated as gatekeepers, preventing the abuse of market dominance and creating a more open, competitive digital ecosystem.



Most DMA obligations apply broadly across gatekeepers, with differences driven by CPS designations, number and type

DMA obligations across Articles 5-7

Gatekeepers		Overall	5(2)	5(3)	5(4)	5(5)	5(6)	5(7)	5(8)	5(9)	5(10)	6(2)	6(3)	6(4)	6(5)	6(6)	6(7)	6(8)	6(9)	6(10)	6(11)	6(12)	6(13)	7
	 Alphabet	21/22	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A
	 Apple	17/22	✓	✓	✓	✓	✓	✓	✓	N/A	N/A	✓	✓	✓	✓	✓	✓	N/A	✓	✓	N/A	✓	✓	N/A
	 Meta	16/22	✓	N/A	✓	✓	✓	✓	✓	✓	✓	✓	N/A	N/A	✓	N/A	N/A	✓	✓	✓	N/A	✓	✓	✓
	 Microsoft	17/22	✓	N/A	✓	✓	✓	✓	✓	N/A	N/A	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓	N/A
	 Amazon	13/22	✓	✓	✓	N/A	✓	N/A	✓	✓	✓	✓	N/A	N/A	✓	N/A	N/A	✓	✓	✓	N/A	N/A	✓	N/A
	 BOOKING HOLDINGS	10/22	✓	✓	✓	N/A	✓	✓	N/A	N/A	N/A	✓	N/A	N/A	✓	N/A	N/A	N/A	✓	✓	N/A	N/A	✓	N/A
	 ByteDance	7/22	✓	N/A	✓	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓	N/A	✓	✓	N/A

Year over year

The only change in applicability of DMA obligations from reporting year 2024 to 2025 across all gatekeepers from last year was Article 5(3), which is N/A to Meta due to de-designation of Facebook Marketplace earlier last year.

Fundamental DMA obligations

Some DMA obligations have such a broad scope that they apply to all gatekeepers, i.e., Art. 5(2), 5(4), 5(6), 6(9), 6(10) and 6(13).

The type of CPS determines DMA applicability

Articles such as 5(9), 5(10), 6(8), 6(11) and 7 apply only where the gatekeeper has been designated for the relevant CPS category. In particular, Article 7 applies exclusively to gatekeepers designated for number-independent interpersonal communications services (NIICS). As of the current designation decisions, only Meta has a NIICS-designated CPS (WhatsApp/Messenger).

The number of CPSes is correlated with the number of DMA obligations

ByteDance is the gatekeeper with the least applicable DMA obligations, and with the lowest number of designated CPSes, followed by BHI, while Alphabet is the gatekeeper with the most applicable DMA obligations, as well as the highest number of designated CPSes.

Audited profiling technique reports consistently cover core requirements but vary in depth in later sections

Gatekeepers	DMA, Article 15 – Audit Template Section														
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)
 Alphabet	⓪	✓	✓	✓	⓪	✓	✓	✓	✓	✓	–	✓	–	⓪	✓
 Apple	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
 Meta	⓪	⓪	⓪	⓪	✓	⓪	⓪	⓪	⓪	–	–	✓	–	–	–
 Microsoft	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	⓪	⓪	⓪
 amazon	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	⓪	✓	⓪	⓪	✓
 BOOKING HOLDINGS	✓	✓	✓	✓	✓	✓	⓪	⓪	⓪	✓	–	⓪	–	–	✓
 ByteDance	✓	✓	✓	✓	⓪	✓	✓	✓	✓	✓	✓	✓	–	⓪	⓪

(✓) Clearly presented in public report

(⓪) High-level referenced

(–) In-depth verification not feasible based on publicly available information

Our analysis is based solely on the publicly available versions of the audited DMA Article 15 reports. Based on the disclosures, we assessed the level of detail across three categories: (1) Clearly presented – information is explicitly described and elaborated in detail in the public report, (2) High-level referenced – information is mentioned, but only at a general or summary level., and (3) Not explicitly or systematically addressed in the public report – information is not visible in the public report; however it does not indicate non-compliance or absence of information, but rather that such details are expected to be included in the confidential submissions to the European Commission.

Strong convergence on foundational profiling and data use reports

Most gatekeepers clearly focus on explaining their profiling techniques and use of data, demonstrating a shared emphasis on the foundational transparency objectives of Article 15.

Increasing divergence in the depth of later-stage reports

Coverage becomes less consistent in the later sections, with several gatekeepers providing only high-level references or omitting certain elements, indicating differences in report depth or maturity.

Apple not currently publishing an Article 15 profiling report

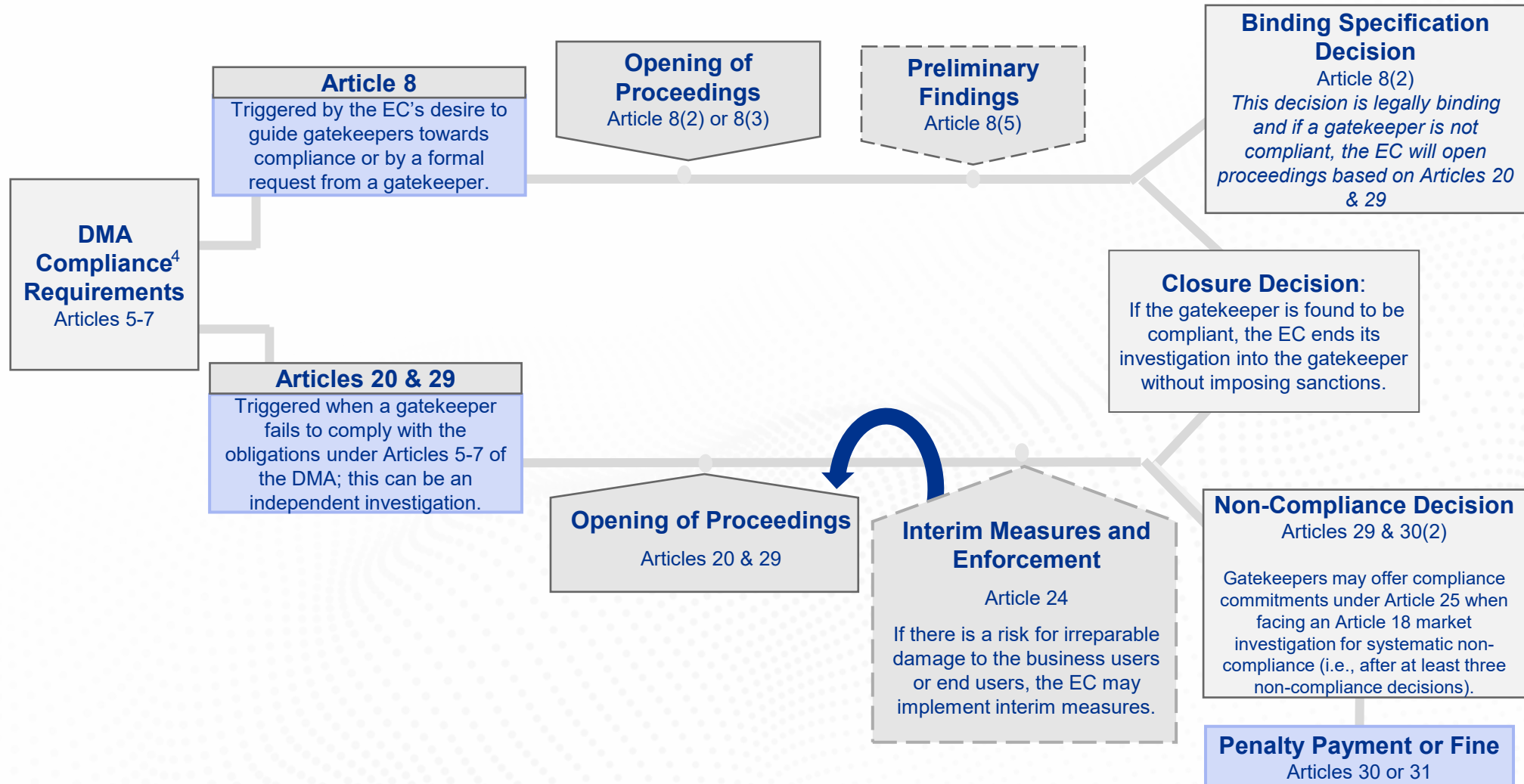
Apple is marked as N/A across all sections, reflecting that Article 15 public reporting is currently not applicable or not available, unlike other designated gatekeepers.

DMA enforcement follows two paths: early supervision (Article 8) and escalation to non-compliance (Articles 20 & 29)

This timeline represents how the EC supervises and specifies gatekeeper compliance with Articles 5, 6, and 7 of the DMA.

The Article 8 process is for identifying risks and acts as a warning mechanism for gatekeepers. During this process, the EC may open proceedings or a gatekeeper may request that the EC investigate whether their compliance measures are being met in relation to the relevant CPS. This timeline maps the progression of EC enforcement practices from an opening of proceedings to either a binding specification decision or closure decision.

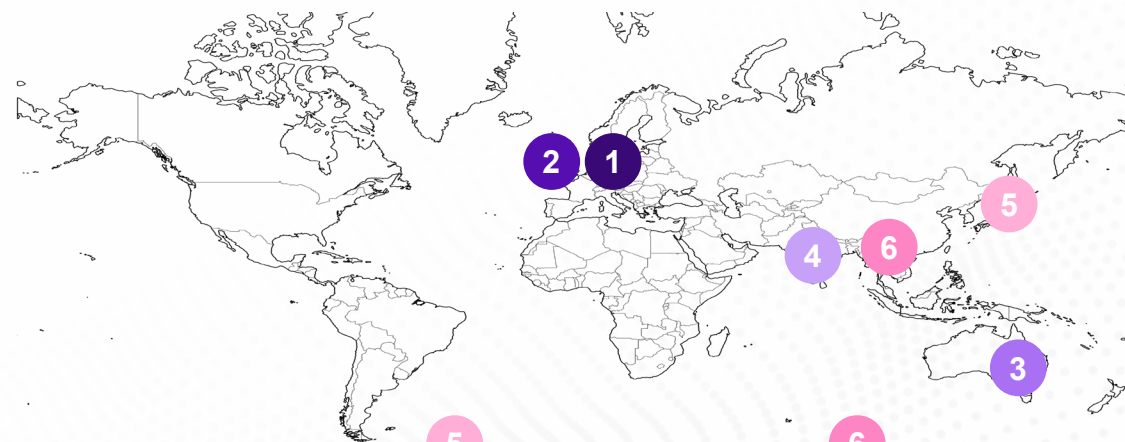
The Article 20 & 29 processes cover DMA safety obligations resulting from either an independent EC investigation or due to non-compliance with an Article 8(2) binding specification decision. It maps the progression of the European Commission's enforcement practices from the opening of proceedings to penalty payments or fines.



Competition regulations are evolving globally

As regulatory pressure intensifies, a growing global shift toward ex ante digital regulation is accelerating the emergence of DMA-inspired frameworks, raising contagion risk as competition requirements and gatekeeper constraints diffuse across jurisdictions, compelling firms to rapidly expand compliance capabilities while adapting to local market priorities.

~25 countries have introduced or are in the process of introducing comprehensive ex ante competition regulations



1 EMEA Jan 2021 – GWB Digitalization Act 10th amendment Germany introduces the GWB Act, this is then amended in 2023 to include further additions. Promotes early detection of anticompetition in digital markets and enables fast intervention for gatekeepers.	2 EMEA Nov 2022 – Digital Markets Act (DMA) Rein in gatekeeper power / ensure fair competition. Nov 2022 – Digital Services Act (DSA) Platform accountability, systemic risk management, harmful content controls.	3 APAC 2020-2025 – ACCC Competition Digital Regulation Priorities Australia is developing a new code of conduct and specific service rules for large digital platforms to promote fair competition.	4 EMEA, Americas & APAC <i>(monitoring)</i> India, May 2024 – India Digital Competition Bill introduced to Parliament. Canada, June 2024 – Canada passes advanced legislative reforms targeting dominant digital platforms through the Fall Economic Statement Implementation Act. Turkey, June 2024 – Provides a revised draft of ex ante digital competition amendments. Brazil, October 2024 – Brazil publishes DMA-inspired ex ante competition proposals.	5 APAC Dec 2025 – Japan Mobile Software Competition Act (MSCA) (JSA) Restore competition in smartphone software markets, reducing major platform dominance and enabling innovation.	6 APAC <i>(monitoring)</i> New Zealand (2025-2026) Digital competition regime under development. Philippines / Vietnam (2025-2026) Platform-specific competition consultations.
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DMA Articles and Content Summary

	Article	Content
Article 5 Obligations for gatekeepers	Art. 5 (2)	Prohibition on cross-service data sharing without consent
	Art. 5 (3)	Prohibition on parity clauses
	Art. 5 (4)	Prohibition on anti-steering restrictions
	Art. 5 (5)	Prohibition on restricting end users' access to services of business users
	Art. 5 (6)	Prohibition on preventing users to raise issues with public authorities
	Art. 5 (7)	Prohibition on requiring the use of specific ID services, web browser engines or payment services
	Art. 5 (8)	Prohibition on tying and bundling
	Art. 5 (9)	Obligation to provide advertisers with daily free online advertising data
	Art. 5 (10)	Obligation to provide publishers with daily free online advertising data
Article 6 Obligations for gatekeepers susceptible of being further specified under Article 8	Art. 6 (2)	Prohibition of non-public data use in competition with business users
	Art. 6 (3)	Obligation to allow uninstallation of pre-installed software and to change default settings
	Art. 6 (4)	Obligation to allow installation of third-party apps (i.e., side loading)
	Art. 6 (5)	Prohibition of self-preferencing in ranking, indexing and crawling
	Art. 6 (6)	Prohibition of restricting possibility to switch
	Art. 6 (7)	Obligation regarding interoperability
	Art. 6 (8)	Obligation to provide advertisers and publishers with access to performance measurement tools
	Art. 6 (9)	Obligation to grant end users and authorized third parties data portability, including access to CPS data
	Art. 6 (10)	Obligation to grant business users and authorized third parties access to CPS data
	Art. 6 (11)	Obligation to provide search engine operators access to search data on FRAND terms
	Art. 6 (12)	Obligation to provide business users access to app stores, online search engines and online social networks on FRAND terms
	Art. 6 (13)	Prohibition of disproportionate conditions to terminate CPSes

DMA Articles and Content Summary

	Provision	Content
Article 7 Obligation for gatekeepers on interoperability of number-independent interpersonal communications services	Art. 7(2)	Obligation on interoperability of basic functionalities of messaging, sharing media, and making calls both one-on-one and in groups
	Art. 7(3)	Obligation on security measures, such as end-to-end encryption, must be maintained across interoperable services.
	Art. 7(4)	Obligation on publishing technical specifications for interoperability to ensure transparency
	Art. 7(5)	Obligation on establishing a timeline for compliance, requiring gatekeepers to respond to interoperability requests within three months
	Art. 7 (6)	Extension of compliance deadlines upon gatekeepers' request
	Art. 7 (7)	Obligation to ensure interoperability while respecting user choice
	Art. 7 (8)	Obligation to collect and share only essential personal data for interoperability
	Art. 7 (9)	Right to take proportionate measures to protect service integrity, security, and privacy.
Article 11 Reporting	Art. 11	Obligation on Compliance Report submission to the European Commission within six months, detailing measures taken to adhere to the Digital Markets Act.
Article 15 Obligation of an Audit	Art. 15	Obligation on conducting an independent audit of the consumer profiling techniques and share findings with the Commission to ensure transparency in digital advertising.

Gatekeepers 2026 Reports

	Compliance Report (Article 11)	Profiling Technique Report (Article 15)
Alphabet	Alphabet - Compliance Report	Alphabet Public Overview - Art. 15 EU DMA
Amazon	Amazon - Compliance Report	Amazon Public Overview - Art. 15 EU DMA
Apple	Apple - Compliance Report	Apple Public Overview - Art. 15 EU DMA
BHI ⁵	BHI - Compliance Report	BHI Public Overview - Art. 15 EU DMA
ByteDance	ByteDance - Compliance Report.pdf	ByteDance Public Overview - Art. 15 EU DMA
Meta	Meta - Compliance Report	Meta Public Overview - Art. 15 EU DMA
Microsoft	Microsoft - Compliance Report	Microsoft Public Overview - Art. 15 EU DMA

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