

Open Consultation on GEO-BLOCKING AND OTHER GEOGRAPHICALLY-BASED RESTRICTIONS WHEN SHOPPING AND ACCESSING INFORMATION IN THE EU

INTRODUCTION

This consultation aims at gathering views and opinions on the different restrictions faced by users, consumers and businesses when they access or provide information, shop or sell across the borders in the European Union.

This will inform the Commission for its ongoing work in preparing legislative proposals on geo-blocking under the Digital Single Market Strategy as well as the follow up to the forthcoming Internal Market Strategy for Goods and Services planned for October 2015.

Questions apply regardless of whether the action takes place online or offline, unless the context makes it clear otherwise.

The public consultation is available in all official languages.

The views expressed in this public consultation may not be interpreted as stating an official position of the European Commission.

If a respondent wishes to have confidential treatment of his/her response, this will be ensured.

For further information and background on this consultation, please refer to the background document

[Geoblocking%20introduction%20text.pdf](#)

This public consultation will close on 28 December 2015 (12 weeks from the day when all language versions have been made available).

How to answer the questionnaire

This questionnaire is composed of two sets of questions: one for customers and one for traders.

If you are a consumer or reply on behalf of consumers, please choose "consumer perspective" in question 1.

If you are a business or reply on behalf of businesses you can choose to reply:

- as a business mainly selling goods and services, please choose "company perspective" in question 1
- as a business mainly buying goods and services, please choose "consumer perspective" in question 1
- as a business selling AND buying goods and services, please choose "consumer AND company perspective" in question 1

Respondents living with disabilities can request the questionnaire in .docx format and send their replies in email to the following address:

CNECT-GEOBLOCKING-CONSULTATION@ec.europa.eu.

If you are an association representing several other organisations and intend to gather the views of your members by circulating the questionnaire to them, please send us a request in email and we will send you the questionnaire in .docx format. However, we ask you to introduce the aggregated answers into EU Survey. In such cases we will not consider answers submitted in other channels than EU Survey.

INFORMATION ABOUT THE RESPONDENT

1. Please indicate who you are (single choice):

- Consumer perspective
- Company perspective
- Consumer AND company perspective
- Others

Tell us about you

- Company providing goods or services
- Business federation
- Chambers of commerce

Please specify the sector of activity

The Federal Association for Information Technology, Telecommunications and New Media (Bitkom) represents more than 2,300 companies in the digital sector, including 1,500 direct members. With more than 700,000 employees, our members generate a domestic turnover of 140 billion Euros a year, exporting high-tech goods and services worth another 50 billion Euros. Comprising 1,000 small and medium-sized businesses as well as 300 start-ups and nearly all global players, Bitkom' members offer a wide range of software technologies, IT-services, and telecommunications or internet services. They produce hardware and consumer electronics or operate in the sectors of digital media and the network industry. 78 percent of the companies' headquarters are located in Germany with an additional amount of 9 percent in other countries of the EU and 9 percent in the USA as well as 4 percent in other regions. Bitkom supports an innovative economic policy by focussing the modernization of the education sector and a future-oriented network policy.

2. Please indicate your place of residence or establishment:

Germany

3. Please specify if you are based in:

- A city (cities of more than 50,000 inhabitants)
- A (small) town or suburban area (5,000 to 50,000 inhabitants)
- A rural area

4. Please provide your contact information (name, address and e-mail address)

Marie-Teresa Weber, Federal Association for Information Technology, Telecommunications and New Media (Bitkom), Albrechtstraße 10, 10117 Berlin, Germany, E-Mail: mt.weber@bitkom.org

5. Is your organisation registered in the Transparency Register?

- Yes
- No
- Not relevant

Registration No.

531830264-31

You have the opportunity to register your organisation (http://europa.eu/transparency-register/index_en.htm) before you submit your contribution.

If you are an association, would you like to share with the Commission any evidence collected from your members or from other sources on geo-blocking or/and other forms of discrimination based on customer's nationality, location or residence?

500 character(s) maximum

Please upload your file (pdf or doc)

QUESTIONS

Traders

1. As a general principle, consumers and businesses should be able to purchase and access services from everywhere in the EU

- I strongly agree
- I agree
- Neither agree nor disagree
- I disagree
- I strongly disagree

Comments

3000 character(s) maximum

This general remark does not mean that we would like all forms of geo-blocking, or rather geo-tailoring, to be banned. It is more appropriate to speak of geo-tailoring for business decisions which result from either the legal fragmentation across the EU or from considerations as regards the specific demand and expectation of user groups. Geo-tailoring can be justified for different reasons. In particular situations and especially for start-ups and for small and medium-sized enterprises it can be important to restrict a business to the home market and to test a business model in a restricted geographical area. Geo-tailoring can be applied because of differences in customer behaviour, interest in a specific product, cultural differences as well as different legal regimes regarding copyright or national safety regulations.

We believe that in order to allow continued innovation in the online space and to foster innovation in Europe it is essential that services are made accessible from everywhere in the EU but in a balanced fashion. We would therefore caution against measures that would threaten the fundamental principles that guarantee the freedom to conduct business (Article 16 of the EU Charter of Fundamental Rights). The Digital Single Market should enable flexible and easy access to legal products and digital content and services at a fair price for consumers, while boosting diversity, creativity and culture and generating more revenues for creators.

Whereas the end objective should remain: improving accessibility to goods, services and content online - a nuanced way of balancing this objective with supporting innovation is needed. Imposing a sweeping ban on Geo-tailoring could ultimately unearth a plethora of legal uncertainties and greatly impact the business models and capabilities of many EU businesses. The question of licences has certain overlaps with the question of geo-tailoring as licences are one of the reasons why geo-tailoring is applied. As this EU-consultation does not focus on the question of licences, our answer to the questionnaire deliberately excludes the subject of licences and geo-tailoring regarding audiovisual content.

Sweeping bans on geo-tailoring are not the way to address the accessibility issues and will only leave the online space with a number of imbalances and some service providers unable to continue providing their services online.

In our view, the current system of EU regulation does not need to be amended. The European Fundamental Freedoms already set the legal framework in which certain kinds of geo-tailoring are already forbidden. We do not see the necessity for further regulation.

2. Which forms of geoblocking and other geographically- based restrictions do you consider as creating significant obstacles to the single market?

	I strongly agree	I agree	Neither agree nor disagree	I disagree	I strongly disagree
Blocking any access to websites across borders, thereby denying access to information, comparisons of service or product ranges and prices), with or without rerouting to 'national' websites	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Allowing access to websites and offers across borders but denying the possibility to complete the order or purchase after obtaining information on the geo-location or residence of the user;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Allowing access to websites across borders but denying the possibility to download digital products across borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Allowing access to websites and offers across borders but denying the possibility to pick up, deliver or ship the goods across borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Differentiating prices or other conditions on the basis of the nationality of the customer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Differentiating prices or other conditions on the basis of the country of residence of the customers or the location from which they are ordering or accessing the services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Denying access to additional services on the basis of the country of residence of the customers or the location from which they are ordering or accessing the services (e.g. loyalty cards, discounts, reduction vouchers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Denying access to after-sales services on the basis of the country of residence of the customers or the location from which they are ordering or accessing the services (e.g. maintenance and repair of the product, customer support)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other forms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comments

3000 character(s) maximum

Traders, businesses and service providers offering goods and services from different EU Member States can experience legal uncertainty and territorial fragmentation as divergences remain in some areas such as consumer protection laws, varying VAT regimes, package delivery, national rating systems, language requirements, child protection obligations, and promotion of local content, to name a few that necessitates traders and service providers to develop market-specific offerings.

However, we would like to reemphasize that questions of audiovisual content and licences are not addressed in the current consultation response.

3. There are different ways in which geo-blocking and other geographically based restrictions can take place. How would you classify the following barriers?

	Very important	Important	Neutral	Not important	I don't know
Re-routing to a website targeting the home country of the visitor without the possibility to overrule	<input type="radio"/>				
Refusing access to a website or an offer based on IP-address (or other technical means allowing to determine the geo-location of the user)	<input type="radio"/>				
Refusing access to a website or an offer based on customers' disclosure of their nationality	<input type="radio"/>				
Refusing access to a website or an offer based on customers' disclosure of their residence	<input type="radio"/>				
Terminating the transaction based on customers' disclosure of their residence	<input type="radio"/>				
Refusing foreign credit cards or other foreign means of payment	<input type="radio"/>				
Linking access to, purchase or download of digital goods or services to the postal address of the customers	<input type="radio"/>				
Linking access to or purchase of non-digital goods or services to the postal address of the customers	<input type="radio"/>				
Application of disproportionately higher shipping costs based on the location of the customer	<input type="radio"/>				
Providing a format for address, postal codes or phone etc. which is specific to certain countries	<input type="radio"/>				
Other barriers	<input type="radio"/>				

4. Have you experienced geo-blocking or other geographically-based restrictions in your business (B2B)?

- Yes
- No

5. Have you applied geo-blocking or other geographically-based restrictions in your business (B2B and B2C)?

- Yes
- No

If yes, to achieve which aim:

There can be reasons why the companies represented by Bitkom tailor their business model to a specific market: Customer behavior, interest in a specific product, cultural differences can be reasons why the available product range differs from country to country. Companies are also still faced with legal uncertainty and territorial fragmentation and tailor their business models according to the different legal requirements.

Computer keyboards as an example differ from country to country. If a customer buys a new computer online, in Germany he will for example be offered the German keyboard as well as the French and the British one. If the customer buys the Computer in Sweden, he might want to choose the Norwegian, the Finnish or the Russian keyboard. The seller does not offer the same range of keyboards in every country as the demand differs from country to country and it would be disproportionately expensive to have a stock of every country-specific keyboard of in every single European country. This example shows that geo-tailoring is often used to adapt the offer to the demand.

6. If you apply restrictions or different conditions to customers located in different EU countries, in which circumstances do you provide them with an explanation?

- We give an explanation upon request of the customer
- We provide a full explanation upfront on our website, in publicity material or in the shop
- We provide explanation to consumer associations if they ask us individually
- We have not been asked any explanation

7. In your opinion, what - beyond legal constraints - might be considered other objective factors justifying geoblocking or, more generally, different treatment of users and customers based on their residence or geo-location?

3000 character(s) maximum

Geo-tailoring can be justified for different reasons. Customer behaviour, interest in a specific product, cultural differences can be reasons why the available product range differs from country to country. It can also be important to restrict a business to the home market and to test a business model in a restricted geographical area.

Geo-tailoring is still required as traders, businesses and service providers offering goods and services from different EU Member States can experience legal uncertainty and territorial fragmentation as divergences remain in some areas including consumer protection laws, varying VAT regimes, package delivery, national rating systems, language requirements, child protection obligations, and promotion of local content, to name a few that necessitates traders and service providers to develop market-specific offerings.

A complete renunciation of geo-tailoring might only be possible with a disproportionately large expense in time, cost and labour. This is why we are against a ban on geo-tailoring. In our view, the current system of EU regulation does not need to be amended. The European Fundamental Freedoms already set the legal framework in which certain kinds of geo-tailoring are already forbidden. We do not see the necessity for further regulation.

8. In your opinion, in which circumstances should geo-blocking, refusing a transaction or, more generally, different treatment of users and customers based on their residence or geo-location not be justified?

	Not justified	Neither justified nor unjustified	Justified	I don't know
Cross border delivery is easily accessible and the customer is prepared to pay additional shipping costs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The customer is prepared to organise the delivery	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
There is no additional cost linked to delivery or other administrative burden (for example: simple downloading of digital content, the customer will use the service/good in the country of the trader or of its supplier)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Customers are prepared to take the risk of concluding a transaction in the language of the trader	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The means of payment used by the customer is internationally valid and accepted in the traders' country	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The brand of the physical store (franchisee or subsidiary) also exists in the customer's country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The trader advertises its products or services also in the customer's country	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The trader has a website targeting specifically the country of the customer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The customer is moving to the seller's country but is not registered yet	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Nationality can never be a justification	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Residence or location of the customer can never be a justification	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other circumstances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

3000 character(s) maximum

Line 1 - 2: This would require further resources from the traders to individualise the request and a customer's willingness to buy should not be equated to a company's ability to supply. This would be a considerable limitation of contractual freedom.

Line 3: Justified geo-tailoring is still required as traders, businesses and service providers offering goods and services from different EU Member States can experience legal uncertainty and territorial fragmentation as divergences remain in some areas including consumer protection laws, varying VAT regimes, package delivery, national rating systems, language requirements, child protection obligations, and promotion of local content, to name a few that necessitates traders and service providers to develop market-specific offerings. As stated above, we exclude questions of licences for audiovisual content in our answer.

Line 5, 7, 8: Concerning trader's websites/advertisements targeting specifically the country of the user, the Consumer Rights Directive (CRD) already addresses the information requirements of traders to consumers within Article 6, and furthermore the concept and further criteria, including use of different language or currencies of directing one's commercial or professional activities to the country of the consumer was already addressed by the Court of Justice.

6: Many products fall under international brands, but are not available on all of the markets the company is active in. Brand alignment does not necessarily lead to homogenous product strategy in all markets.

Line 9: Dependent on billing and delivery information.

9. What should constitute elements of a policy response at the EU level on unjustified geoblocking and other geographically based restrictions?

	I strongly agree	I agree	Neither agree nor disagree	I disagree	I strongly disagree
More transparency: companies should have the obligation to make clear before the (trans)action the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

More transparency: companies should have the obligation to explain upon request the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules including a list of reasons that may never justify treating domestic and foreign users differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules including a closed list of objective and verifiable reasons that may justify treating domestic and foreign users differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules banning ways and means of discriminatory geo-blocking and other restrictions according to your ranking in question 3 above	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Banning the discriminatory blocking of access to websites across borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules imposing on traders to obtain consent of users/customers prior to automatic rerouting to another website (including another language version of the same website)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under the same conditions as those applied to users/consumers of the 'home' country of the provider	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under conditions reflecting the additional administrative costs or burdens resulting from the cross-border transaction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Rules requiring traders to accept cross-border transactions from users/consumers from throughout the EU and to provide delivery cross-border if the users/customers are willing to organise themselves the delivery and cover the additional shipping costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules prohibiting traders to refuse the cross-border download of digital products (such as software or video games)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules applicable only to online transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules applicable only to physical purchases and orders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. In your view should SMEs, particularly micro enterprises, be exempted from regulatory measures in this context?

- Yes
 No

If yes, under which circumstances?

11. In your view what would be the best policy instrument (or combination thereof) to intervene in this context at EU level?

None .

12. How can effective implementation best be ensured?

	I strongly agree	I agree	Neither agree nor disagree	I disagree	I strongly disagree
Monitoring and enforcement by the European Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Monitoring and enforcement by national authorities (e.g. consumer protection authorities or competition authorities)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
More effective cross-border cooperation mechanism between national authorities to ensure that rules against unjustified restrictions can be enforced within the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
By alternative dispute resolution bodies (ombudsman, online conciliation services, by (national) European Consumer Centres etc. for example)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Or other existing best practices that you are aware of including self-regulation of companies) – please give examples

3000 character(s) maximum

13. From a business perspective, what would be the overall impact of addressing geo-blocking and other geographically based restrictions?

	Very positive	Somewhat positive	Neutral	Somewhat negative	Very negative	I don't know
For my business sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
For the economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
For cross border e-commerce	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
For cross border trade generally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain why/which opportunities?

3000 character(s) maximum

Whereas the end objective should remain: improving accessibility to goods, services and content online - a nuanced way of balancing this objective with supporting innovation is needed.

Sweeping bans on geo-tailoring are not the way to address the accessibility issues and will only leave the online space with a number of imbalances and some service providers unable to continue providing their services online.

14. Can you indicate for each of the possible measures listed what would be the impact (where possible, quantified) in terms of new market opportunities as well as additional costs or burden?

	Very positive	Somewhat positive	Neutral	Somewhat negative	Very negative	I don't know
More transparency: companies should have the obligation to make clear before the (trans)action the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
More transparency: companies should have the obligation to explain upon request the detailed, objective and verifiable reasons why they treat customers differently based on their residence or nationality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Rules including a list of reasons that may never justify treating domestic and foreign users differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules including a closed list of objective and verifiable reasons that may justify treating domestic and foreign users differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules banning ways and means of discriminatory geo-blocking and other restrictions according to your ranking in question 3 above	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Banning the discriminatory blocking of access to websites across borders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules imposing on traders to obtain consent of users/customers prior to automatic rerouting to another website (including another language version of the same website)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under the same conditions as those applied to users/consumers of the 'home' country of the provider</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Rules requiring traders to accept cross-border transactions from users/customers from throughout the EU under conditions reflecting the additional administrative costs or burdens resulting from the cross-border transaction</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Rules requiring traders to accept cross-border transactions from users/consumers from throughout the EU and to provide delivery cross-border if the users/customers are willing to organise themselves the delivery and cover the additional shipping costs</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Rules prohibiting traders to refuse the cross-border download of digital products (such as software or video games)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules applicable only to online transactions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules applicable only to physical purchases and orders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other impact	<input type="radio"/>	<input type="radio"/>				

15. Such impact would, in your view, be mostly on

- my business sector
- economy
- cross border e-commerce
- cross border trade generally

16. If you think that EU measures in this area would impose significant additional burden on traders, which burden do you think of?

- Additional administrative compliance costs
- Additional costs in the area of marketing or web design
- Additional personnel costs
- Additional delivery costs

Other type of additional costs (please specify)

Other type of burden (please specify)

Although we do not understand the questionnaire to address audiovisual content and licencing questions, Bitkom notes that - if the EC should ban geo-tailoring in the area of audiovisual content and licencing, the licencing costs would increase exponentially.

Background Documents

BG_ Въведение (/eusurvey/files/569c3297-4c50-4bb4-a551-491946ed9c10)

BG_Декларация за защита на личните данни (/eusurvey/files/7ff56652-aac3-45b1-884e-489769989359)

CS_Prohlášení o ochraně osobních údajů (/eusurvey/files/96c65fdb-2e85-404c-bb2c-694c056e191d)

CS_Úvod (/eusurvey/files/ed4e3ddc-8074-4948-95dd-b88cbd5b7d09)

DA_Databeskyttelseserklæring (/eusurvey/files/e950b5f7-a4de-4441-bb1e-df7850f4777f)

DA_Introduktion (/eusurvey/files/a73782f4-0b31-4ab4-b308-449ba4a73f84)

DE_Datenschutzerklärung (/eusurvey/files/46640fa4-a21a-4617-b5ee-8497301f3262)

DE_Einleitung (/eusurvey/files/c9945790-55fd-4358-84b2-cb96ac9f3565)

EL_Δήλωση περί απορρήτου (/eusurvey/files/4b9465d4-41a0-4eaf-bc22-cb228d0b9e7f)

EL_Εισαγωγή (/eusurvey/files/82a216da-201f-40fd-b952-f0b707456ba0)

EN_Introduction Text (/eusurvey/files/e09a8b83-a510-4fe7-8870-593a05dc9eb2)

EN_Privacy Statement (/eusurvey/files/c23ca6a8-da34-4823-a8c9-23f073daa3d3)

ES_Declaración de privacidad (/eusurvey/files/fb4c5886-8667-4809-9683-c3a4b3416933)

ES_Introducción (/eusurvey/files/9154f712-b814-4635-8671-bf42a5150e9b)

ET_Isikuandmete kaitse põhimõtted (/eusurvey/files/487d5aec-2ccf-407d-bda9-c4ce203013d6)

ET_Sissejuhatus (/eusurvey/files/552bfc09-8d43-4e7c-a742-436f1f6bcd43)

FI_Johdanto (/eusurvey/files/74433faa-52af-45a7-bcb2-52e6f6424b8a)

FI_Tietosuojaseloste (/eusurvey/files/a2851659-c416-4e99-a3b0-16793d314938)

FR_Déclaration relative à la protection de la vie privée (/eusurvey/files/fbf32d01-94ae-4b5d-bf20-ea6952e16e47)

FR_Introduction (/eusurvey/files/dc9d8dd3-9268-419d-9e73-73149975cbd1)

HR_Izjava o zaštiti osobnih podataka (/eusurvey/files/d5126c7d-c35c-44db-a2dc-852f26cf8dc9)

HR_Uvod (/eusurvey/files/4b1fdb51-46b2-4db9-a316-24f1cde9e5d5)

HU_Adatvédelmi nyilatkozat (/eusurvey/files/c3d339a2-9c81-42dd-84db-0f06a4458f8f)

HU_Bevezetés (/eusurvey/files/2a5a75c9-2117-42d5-ab7b-56e1d05bd9f9)

IT_Informativa sulla privacy (/eusurvey/files/224ce6e0-e844-4cb0-9890-3302faaba799)

IT_Introduzione (/eusurvey/files/a8bd3ae7-42a6-4433-98e4-0d5fd76de652)

LT_Pareiškimas apie privatumo apsaugą (/eusurvey/files/c5bab167-cbc7-49fb-9a89-8c3af2defff3)

LT_Įvadas (/eusurvey/files/0206634e-0ebf-4bbc-bdbf-34231b60629a)

LV_Īevads (/eusurvey/files/b8423779-d6df-4f3c-9fb9-8b7f3f441bae)

LV_Paziņojums par konfidencialitāti (/eusurvey/files/2ab0a84b-dbd8-49e5-b058-ae659bab171a)

MT_Dikjarazzjoni ta' Privatezza (/eusurvey/files/undefined)

MT_Introduzzjoni (/eusurvey/files/7f2d6b62-1a0f-4d19-8d6c-fd92ba1b16ed)

NL_Inleiding (/eusurvey/files/114357ac-c621-4d3e-9e37-bbabf922995c)

NL_Privacyverklaring (/eusurvey/files/7e6e3e72-9bf7-4063-840c-2fb01e10d738)

PL_Oświadczenie o ochronie prywatności (/eusurvey/files/30559dda-9de1-4c4a-9748-0ecc898785a4)

PL_Wprowadzenie (/eusurvey/files/35485924-2bcc-406d-a842-7c22f5bdda92)

PT_Declaração de privacidade (/eusurvey/files/2f759e57-d32e-42a8-8f5e-8964437a00c1)

PT_Introdução (/eusurvey/files/10efba9a-f3bb-4eb0-b696-2c25ea658380)

RO_Declarație de confidențialitate (/eusurvey/files/7e406ee5-b266-4ecd-8356-2121bd1604d7)

RO_Introducere (/eusurvey/files/69f56263-5125-47fa-8ff9-1134cc82bbee)

SK_Vyhlásenie o ochrane osobných údajov (/eusurvey/files/a57e6d58-01d3-4161-bc68-ee42c1a2ec19)

SK_Úvod (/eusurvey/files/0124210c-e806-4e52-8298-72221b373aec)

SL_Izjava o varstvu osebnih podatkov (/eusurvey/files/77c4282b-a266-4f86-830b-b1cb7414a2ce)

SL_Uvod (/eusurvey/files/fd193fb5-6ff5-4338-81e5-e8885d43bdae)

SV_Inledning (/eusurvey/files/7e636307-0080-4dda-8b59-d74000b5b243)

SV_Regler för skydd av personuppgifter (/eusurvey/files/1d3f02d9-8a9b-4f0f-87d7-549a05c1f462)

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