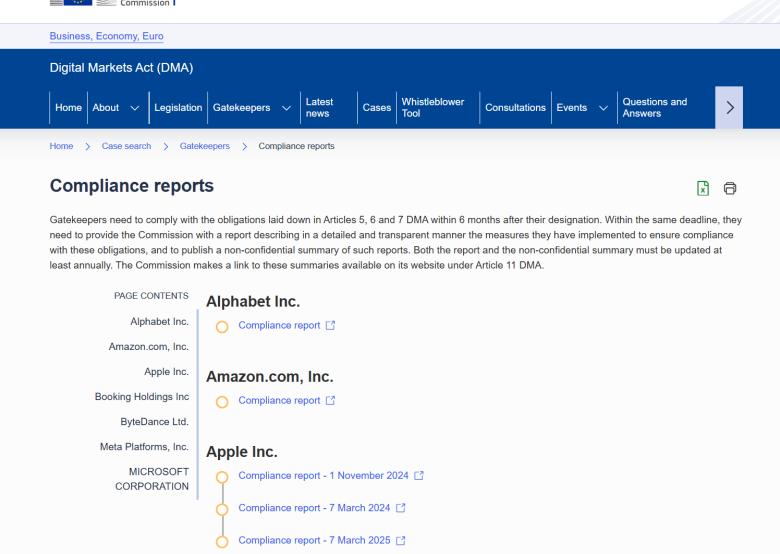




2025 Microsoft DMA compliance workshop

Brussels, 20 June 2025



Scan to reach the gatekeeper's compliance reports



Link to the DMA compliance reports: https://digital-markets-act-cases.ec.europa.eu/reports/compliance-reports



Agenda (part 1)

9:00-9:30	Registration/coffee	
9:30-9:40	Introductory remarks by the Commission	
9:40-9:55	Presentation by the Commission on the regulatory dialogue with Microsoft	
Update on LinkedIn DMA compliance		
9:55-10:30	Presentation by Microsoft on effective compliance, main changes to the compliance measures and new developments (LinkedIn) Main topics: 1. LinkedIn Data combination and cross-use 2. LinkedIn Data portability and data access 3. Integration of AI solutions on LinkedIn and explanation on how possible DMA considerations have been addressed	
10:30-11:10	Q&A on the presentation and open discussion	
11:10-11:30	Coffee break	



Agenda (part 2)

Update on Windows PC OS DMA compliance	
	Presentation by Microsoft on effective compliance, main changes to the compliance measures and on main new developments (Windows PC OS)
11:30-12:00	 Easy change of defaults and uninstallation requirements in Windows Integration of AI solutions on Windows and explanation on how possible DMA considerations have been addressed
12:00-12:30	Q&A on the presentation and open discussion
Other topics and conclusions	
12:30-13:00	Q&A on any other topics related to Microsoft's DMA compliance
13:00-13:10	Concluding remarks by the Commission



Rules of engagement

- No reference to ongoing or past proceedings
- No attacks; questions should remain polite and constructive
- The Commission will moderate the discussions
- The Commission will not provide legal interpretations / take any positions
- No sharing of business sensitive information
- Objective is to hear stakeholders' feedback on the compliance solutions
- We may not be able to take all comments and questions. Any further substantive observation can be sent to EC-DMA@ec.europa.eu



Rules for the Q&A

- When taking the floor always state your **name and organisation** (in room and via **slido**)
- Anonymous questions on **slido** will not be discussed
- Questions and comments should be
 - clear and short = 2 min max
 - relevant and on-topic of the specific DMA obligation
 - constructive
- One question or comment per intervention

Online questions and comments via: S CO



https://app.sli.do/event/qbPEaM9m68YvGPHnNjFRMe







Highlights on regulatory dialogue

- Numerous exchanges took place with Microsoft and third parties
- Focus has been on:
 - Data combination and cross-use (Article 5(2))
 - Data portability and data access (Articles 6(9) and 6(10))
 - Easy change of defaults and uninstallation requirements in Windows (Article 6(3))
- Regulatory dialogue with Microsoft included also other obligations relevant for Microsoft, including, for Windows, the interoperability obligation Article 6(7)



Data combination and cross-use

Main objectives - Data combination and cross-use (Art. 5(2))

- Gatekeepers must obtain <u>explicit user consent before combining or cross-using personal data from their core platform services</u>
- In line with the General Data Protection Regulation (GDPR) and emphasizes the importance of <u>free</u>, informed, and specific consent from users regarding how their data is processed and utilized
- Contributes to the broader objectives of <u>enhancing contestability and</u> <u>fairness</u>, <u>encouraging transparency</u>, <u>protecting user rights in the</u> <u>digital landscape</u>.



Data combination and cross-use

Main areas of regulatory dialogue

- In December 2024, LinkedIn introduced a more granular approach for LinkedIn members to consent to LinkedIn's processing of certain categories of personal data for personalized advertising ("ad") purposes
- Assessment of data-related implications in the context of the launch of new AI features and services relating to its designated CPS LinkedIn and Windows PC OS.



Data portability and data access

- Main objectives end user data portability (Art. 6(9)) and data access (Art. 6(10))
 - \circ allowing real time and continuous access to in-scope data for effective data portability (6(9) and for data access and use (6(10))
 - In-scope data for article 6(9): data provided or generated by the end user in the context of using the core platform service, e.g. profile information, preferences, interaction history;
 - ➤ In-scope data for article 6(10): generated in the context of the use of the gatekeeper's core platform services by those business users and their customers, e.g. user engagement data, crash data, sales data.
 - Enabling end users to authorise the <u>direct recurrent transfer</u> of their data to <u>third parties to</u> <u>offer innovative services</u>
 - Dedicated portals/webpages allowing business users and 3Ps to request additional data
 - Improvement of the transparency of the tools



Data portability and data access

Main areas of regulatory dialogue

- OEnhancement of existing APIs to facilitate real time and continuous data access for users and business users.
- olmproving the granularity of available datasets and setting up dedicated portals allowing business users to request additional data
- o"Recall": Microsoft very recently introduced this new AI feature. The Commission will seek feedback on the data portability solution implemented by Microsoft



Easy change of defaults and uninstallation requirements in Windows

 Main objectives – easy default switching and apps uninstallation (Art. 6(3))

More choice of digital services:

- Changing the default settings enables end users to choose which apps suit best their needs for a given action
- Uninstalling pre-installed apps enables end users to choose which apps should appear on their device



Easy change of defaults and uninstallation requirements in Windows

Main areas of regulatory dialogue

- Setting the default web browser will apply to additional link/file types and will pin it to the Taskbar
- Propagation of default settings: Bing and Start Experiences will open web content with the default web browser
- Windows Search: allowing alternative apps to provide web search results (updated design)
- Uninstallation of apps: allowing end users to uninstall Microsoft Store





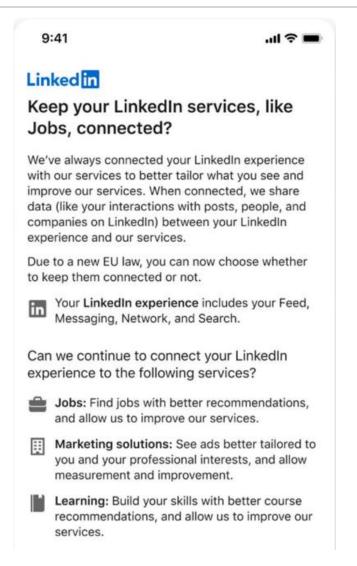
Microsoft DMA Workshop 20 June 2025



LinkedIn DMA compliance updates

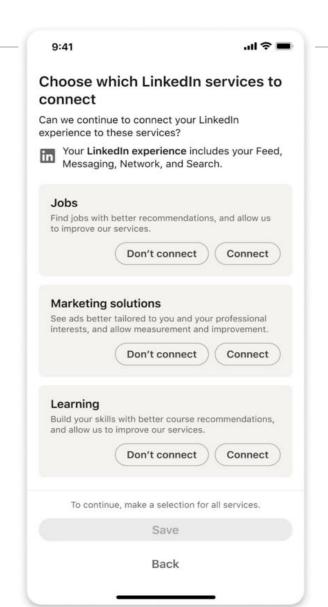
- LinkedIn DMA Compliance Report 2025
 - https://aka.ms/dma-linkedin-2025
- Microsoft DMA Compliance Website
 - https://www.microsoft.com/en-us/legal/compliance/dmacompliance

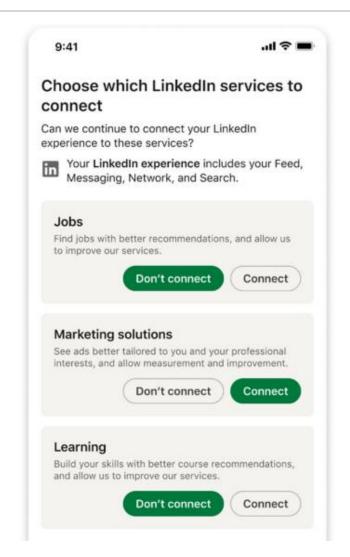
Reminder on LinkedIn's compliance with Article 5(2)

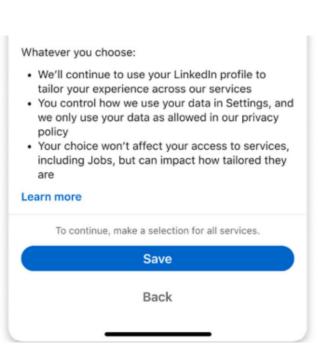


Whatever you choose: • We'll continue to use your LinkedIn profile to tailor your experience across our services • You control how we use your data in Settings, and we only use your data as allowed in our privacy policy Learn more Your choice won't affect your access to services, including Jobs, but can impact how tailored they are. Yes, keep all connected Connect none More options

Reminder on LinkedIn's compliance with Article 5(2)



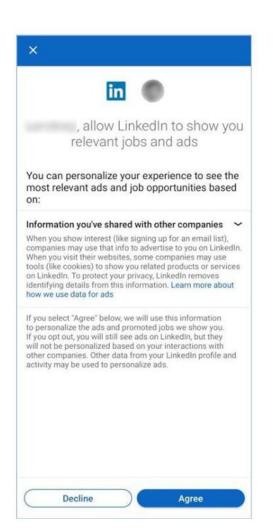




Changes to 5(2)(a) consent for Matched Audiences

Old GDPR Consent

New GDPR Consent



Choose how we use your data for personalized ads

You have control over how Linkedlin uses your data for personalized ads, including measurement and improvement. Today, we use data from your Linkedlin profile for ads.

Can LinkedIn use the following additional data about you for personalized ads?

If you accept, we will use this data for a more personalized ad experience. If you decline, you will still see ads and have access to jobs, but we will not use the data listed below for personalized ads.

Whatever you choose, we will continue to use your LinkedIn profile data for personalized ads under legitimate interest unless you opt out in your ad settings.

LinkedIn Data

- · Inferred City Location
- Inferred Gender and/or Age Range
- LinkedIn Activity Data
- Inferred Interests and Traits

Show more ~

Off LinkedIn Data

From Ad Partners for ads off LinkedIn

From Advertisers for ads

From Advertisers to Measure ad success

Show more ~

Whatever you choose:

- · You'll still see ads on LinkedIn, but they may be less personalized.
- We'll use personal data from your profile for ads (unless you opt-out of that use).
- · Your access to LinkedIn's features, such as jobs, won't be affected.
- You can always control whether and how we use your data for ads in Settings.

Learn more about our use of data for personalized ads. Please also visit our updated European Regional Privacy Notice

Your choice won't affect the number of ads you see or your access to jobs.

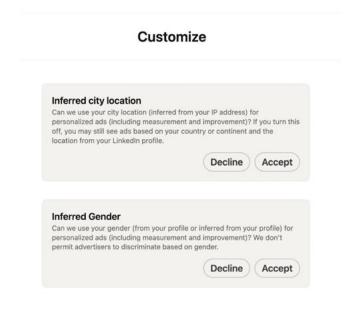
Accept

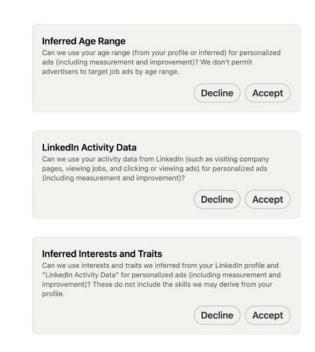
Decline

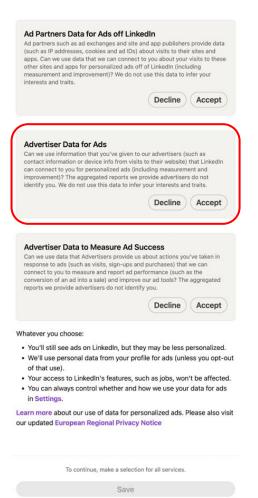
Customize

Changes to 5(2)(a) consent for Matched Audiences

New GDPR Consent (Customize View)







Back

Interplay between DMA and GDPR Consents

Updated DMA LMS Setting



Marketing solutions

Can we connect your LinkedIn experience (including your Feed, Messaging, Network, and Search) to our Marketing solutions service so we can personalize ads, and allow measurement and improvement?

Connecting "Marketing Solutions" means that we will use your LinkedIn activity data, data we have inferred about you along with certain third party data for ads, and we will also measure and optimize our ad systems, but only to the extent your relevant ad settings allow the use of this data for ads. Learn more about the related ad setting.

You can customize your individual preferences in Advertising data settings.

Don't connect

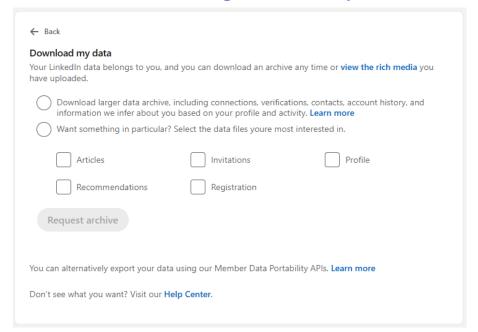
Connect

Article 6(9) – Data access for end users

LinkedIn members can access and download their own LinkedIn provided and generated data (e.g., member profile data, list of first-degree connections, messages, likes, comments, shares, follows, ads clicked, and job applications) via an export tool.

Since March 2024, LinkedIn also offers an API program ("Member Data Portability API") for its members and their authorized third parties to access the members' own LinkedIn data in a continuous and real-time manner.

Member Settings - Data Privacy

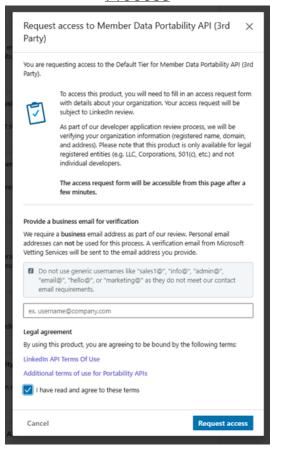


API Product Catalog

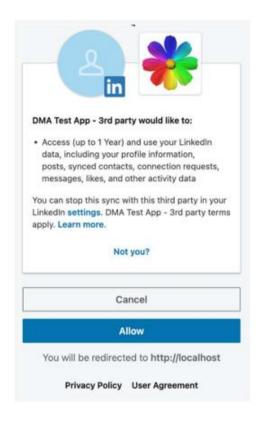
Regulatory Developer Products		
View Regulatory Developer Products Docs		
Pages Data Portability	Member Data Portability	
Provide access to LinkedIn pages data to developers upon Page admin authorization	Provide access to a member's LinkedIn data for members and enterprises	
View Docs	View Docs	

Article 6(9) – Data access for end users

Third-Party Developer Application Process



Member Data Portability API Consent Screen



Sample "Post" Data Returned

```
"paging": {
"start": 0.
  "count": 10,
 "links":[]
   "owner": "urn:li:person:0mI_7RdTVe",
   "resourceId": "urn:li:share:7115394080607547392".
    "method": "CREATE"
    "configVersion": 87,
   "parentSiblingActivities":[],
   "resourceName": "ugcPosts".
   "resourceUri": "/ugcPosts/urn:li:share:7115394080607547392",
   "actor": "urn:li:person:0mI_7RdTVe"
    "activityId": "f7e334f9-e9e9-4c05-b3f7-f79bee41ae91".
    "processedAt": 1696442176629,
    "activityStatus": "SUCCESS"
   "capturedAt": 1696442146564,
    "processedActivity": {
     "lifecycleState": "PUBLISHED",
     "visibility": {
       "com.linkedin.ugc.MemberNetworkVisibility": "PUBLIC"
      "author~": {...},
      "specificContent": {
       "com.linkedin.ugc.ShareContent": {
         "shareCommentary": {
           "attributes":[].
           "text": "Hello World!! LinkedIn Post"
         "shareFeatures": {
           "hashtags":[]
         "shareMediaCategory": "NONE"
      "author": "urn:li:person:0mI 7RdTVe".
      "ugcOrigin": "FEED"
     "firstPublishedAt": 1696442146522,
      "lastModified": {
       "actor": "urn:li:person:0mI_7RdTVe",
       "actor~":{
         "localizedLastName": "Test".
         "firstName":{
           "localized": {
            "en_US": "firstName"
```

Article 6(9) – Updates

- Since March 2024, LinkedIn has continued to update the Member Data Portability APIs, including to reflect changes to the features that are available on the LinkedIn platform.
 - For example, data associated with a member's use of our Learning role play product feature is now provided via the Member Data Portability APIs.
- LinkedIn has received some support requests and inquiries related to the Member Data Portability APIs, to which LinkedIn responded accordingly.
 - For example, developers have asked for increased call limits, noted API errors, and empty API responses. LinkedIn has addressed their concerns and resolved the open issues.
- As of 31 December 2024, ~980 applications to utilize the APIs were granted access as part of the process. Over 921,000 API calls were made successfully so far.

Article 6(10) – Data access for business users

LinkedIn has existing business tool user interfaces ("UIs") and reporting APIs:

- Business users of the LinkedIn CPS and other services (Recruiter, Sales Navigator, Jobs, and Learning)
 can access their data in their respective UIs and via business user system integrations (e.g., via APIs);
- LMS advertisers can access ad performance metrics via Campaign Manager and reporting APIs; and
- Business users of the LinkedIn CPS Pages can access their data in the Pages Admin UI and for a subset of their data, via Community Management APIs.

Since March 2024, LinkedIn also offers the "Pages Data Portability API" program.

Article 6(10) – Data access for business users

Developer Application Process

Request access to Pages Data Portability API

You are requesting access to the Standard Tier for Pages Data Portability API.



To access this product, you will need to fill in an access request form with details about your organization. Your access request will be subject to LinkedIn review.

As part of our developer application review process, we will be verifying your organization information (registered name, domain, and address). Please note that this product is only available for legal registered entities (e.g. LLC, Corporations, 501(c), etc.) and not individual developers.

The access request form will be accessible from this page after a few minutes.

Provide a business email for verification

We require a **business** email address as part of our review. Personal email addresses can **not** be used for this process. A verification email from Microsoft Vetting Services will be sent to the email address you provide.

Legal agreement

By using this product, you are agreeing to be bound by the following terms:

LinkedIn API Terms Of Use

Additional terms of use for Portability APIs

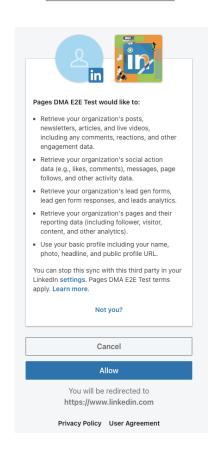
I have read and agree to these terms

Cancel

Request access

X

Pages Data Portability API Consent Screen



Sample "Page Follows" Data Returned

```
"paging": {
  "start": 0.
  "count": 10.
  "links": [].
  "total": 2
"metadata": {
  "nextPaginationCursor": "NV9f"
},
"elements": [
    "lastModifiedAt": 1701259792468,
   "follower": "urn:li:person:WIOb",
    "followee": "urn:li:organizationalPage:123456",
   "edgeType": "MEMBER_FOLLOWS_ORGANIZATIONAL_PAGE"
    "lastModifiedAt": 1699980274432,
   "follower": "urn:li:person:szIhq",
   "followee": "urn:li:organizationalPage:123456",
    "edgeType": "MEMBER_FOLLOWS_ORGANIZATIONAL_PAGE"
```

Article 6(10) – Updates

- Since March 2024, LinkedIn has continued to update the Pages Data Portability APIs, including to reflect changes to the features that are available on the LinkedIn platform.
 - For example, as of August 2024, there is an API for developers to access a list of members who
 visited their Page subject to member settings now that this data is available to Premium
 Company Page admins on the platform.
- LinkedIn has received some support requests and inquiries related to the Pages Data Portability APIs, to which LinkedIn responded accordingly.
 - o For example, developers have submitted inquiries about the status of their application, API errors, and empty API responses. LinkedIn has addressed their concerns and resolved the open issues.
- As of 31 December 2024, <u>~410 applications</u> to utilize the APIs were granted access as part of the process. <u>Over 2 million API calls</u> were made successfully so far.

GenAl Features Integration – DMA Compliance

Since March 2024, LinkedIn has developed and integrated multiple GenAI features into existing products to enhance LinkedIn user experiences.

To power GenAl features, LinkedIn uses (i) LLMs that produce content and (ii) existing Al/ML models, which both comply with DMA Article 5(2) in the same way they previously did – by honoring EEA members' DMA consent settings.

For other relevant DMA obligations, LinkedIn's use of LLMs for GenAI features would adhere to the same compliance measures as described in LinkedIn's 2025 DMA Compliance Report.

GenAl Features Integration – DMA Compliance

Examples include:

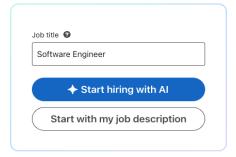
- Jobs with AI-assistant helps members who post and promote jobs on LinkedIn to streamline certain manual parts of the recruiting process, including candidate outreach and application review.
 - Jobs with AI-assistant consists of multiple features, and LinkedIn complies with Article 5(2)(b) at the feature level.
 - For instance, a feature that combines end user personal data from the LinkedIn CPS and Jobs would check and honor EEA members' DMA consent.

Hi Brooke, find your next great hire 86% of small businesses get a qualified candidate in

As your Al-assistant, I can help you:

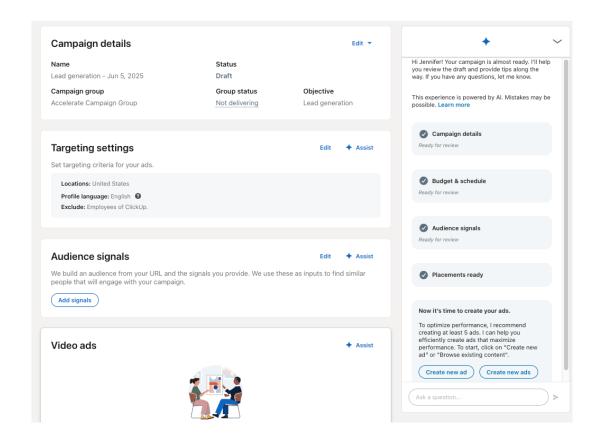
one day

- ✓ Post a job faster by drafting a job description
- ✓ Quickly presort applicants according to your criteria*
- √ Find up to 25 qualified people on LinkedIn per day to invite to apply*



GenAl Features Integration – DMA Compliance

- LMS Accelerate is LinkedIn's AI-powered advertising campaign type that helps advertisers to more easily create advertisement content and target audiences as well as initiate ad campaigns.
 - For the ad audience creation feature, which involves end user personal data combinations between the LinkedIn CPS and LMS, LinkedIn checks and honors EEA members' DMA consent for running the ad campaigns.
 - The ad content creation feature does not involve such data combinations by LinkedIn and thus does not require DMA consent.



Rules for the Q&A

- When taking the floor always state your **name and organisation** (in room and via **slido**)
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 - clear and short = 2 min max,
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Online questions and comments via: S CO



https://app.sli.do/event/qbPEaM9m68YvGPHnNjFRMe









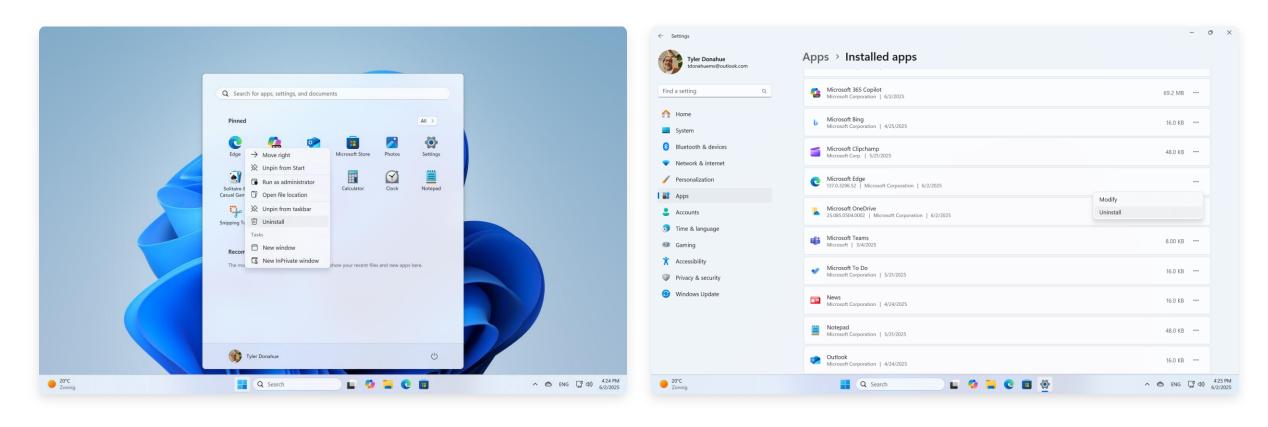


Windows DMA compliance updates

- Windows DMA Compliance Report 2025
 - https://aka.ms/dma-windows-2025

- Windows June 2025 Blog Post
 - https://aka.ms/dma-blog-june-2025

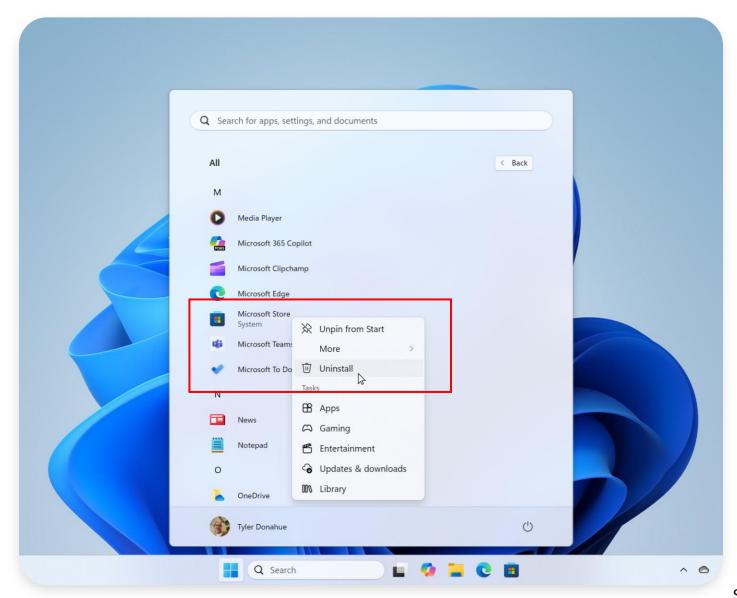
Article 6(3) – Users can uninstall applications on Windows



Uninstalling an application from the Start Menu

Uninstalling an application from the Settings > Apps > Installed apps list

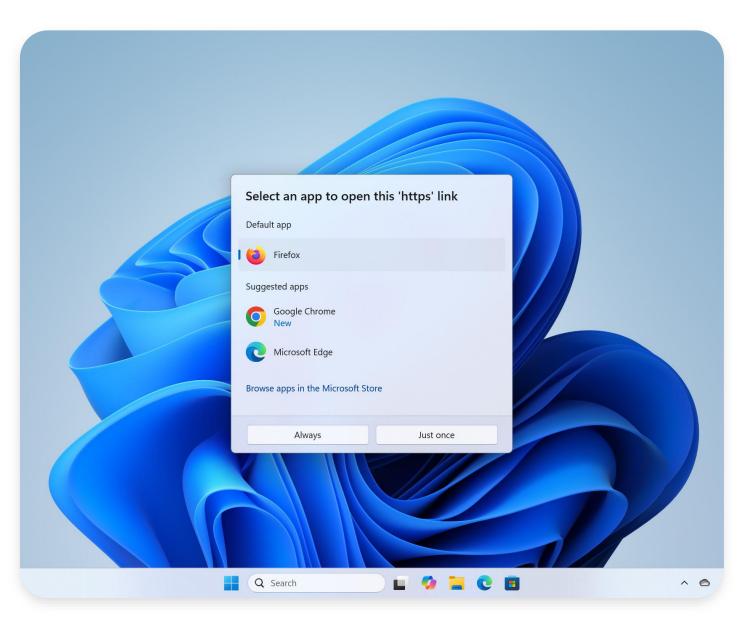
Article 6(3) – Users can uninstall the Microsoft Store



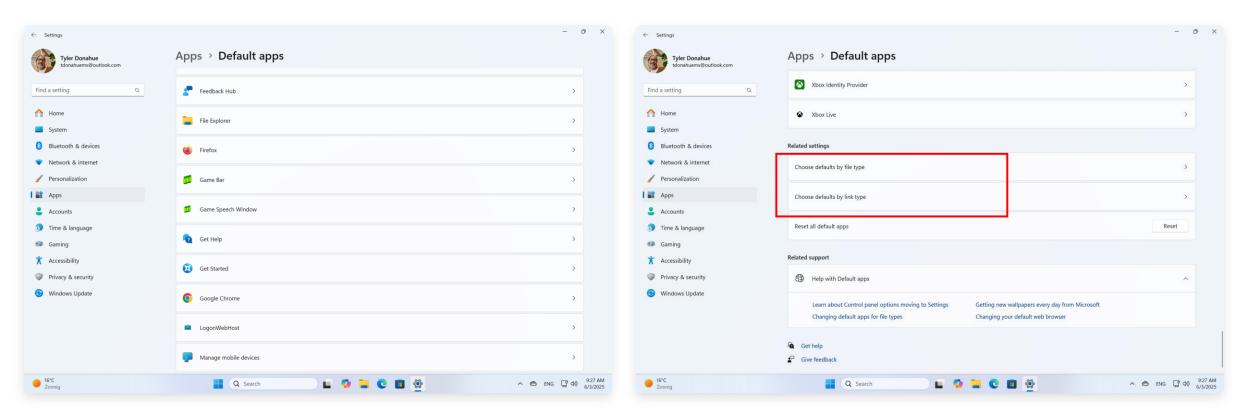
Articles 6(3) & 6(4) – Defaults are easily configurable on Windows

 Windows asks users whether they want to set a newly installed application as the default

 Applications may prompt users to be set as the default



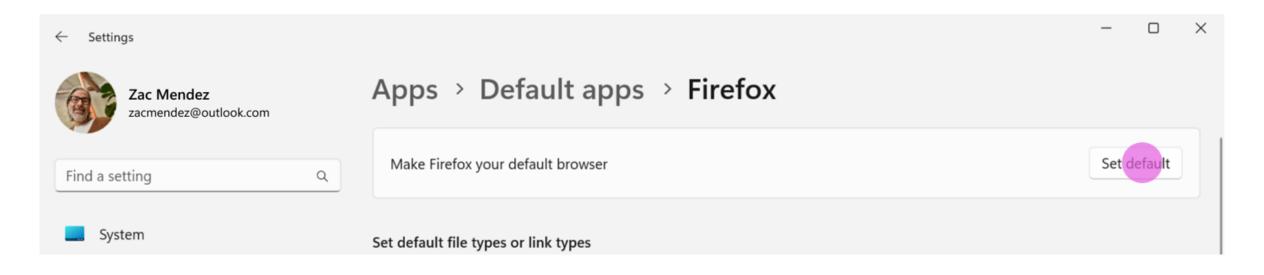
Articles 6(3) & 6(4) – Defaults are easily configurable on Windows



Users can set defaults by application in Settings

Users can set defaults by file or link type in Settings

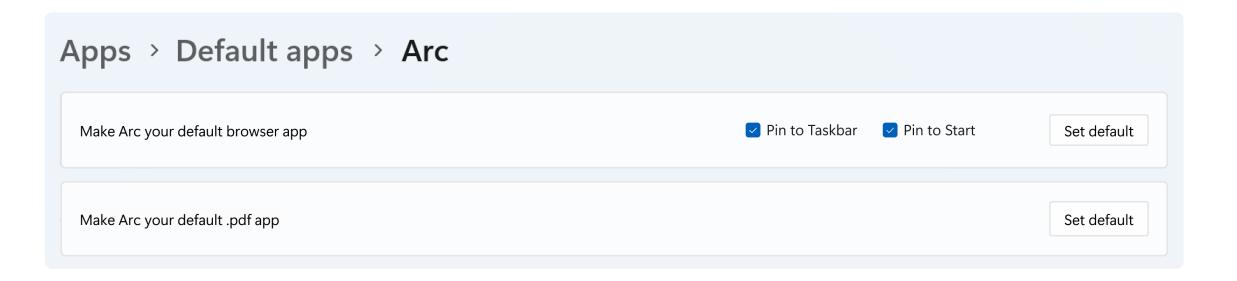
Articles 6(3) & 6(4) – Original settings for default browser



Originally, the "Set default" button configured the browser as the default handler for:

- Link types: http, https
- File types: .htm, .html

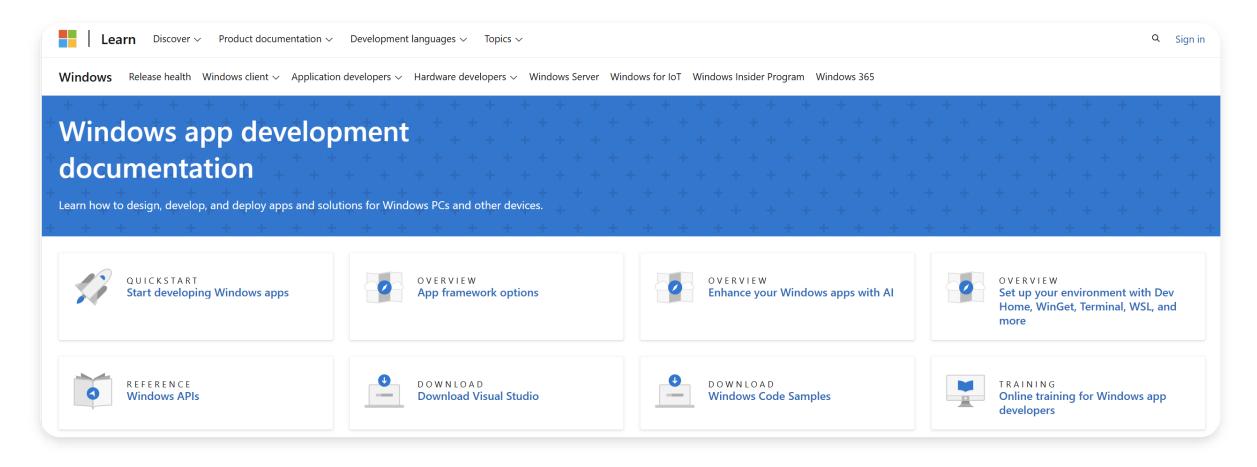
Articles 6(3) & 6(4) – New settings for default browser



Setting the default browser in Settings with the "Set default" button will now set the following link and file types (if the browser registers for them) in the EEA:

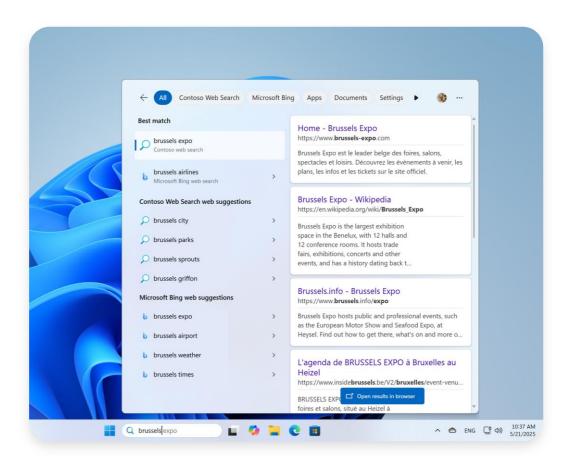
- Link types: ftp, http, https, read
- File types: .htm, .html, .mht, .mhtml, .shtml, .svg, .xht, .xhtml, .xml

Article 6(7) - Interoperability



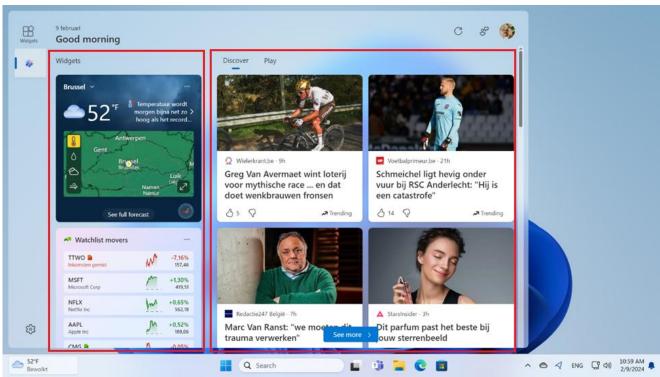
Windows has documented APIs and provides developer tools to enable third-party applications to access the same hardware and software features as Microsoft apps and services.

Article 6(7) – Windows Search and Widgets Board extensibility



Windows Search

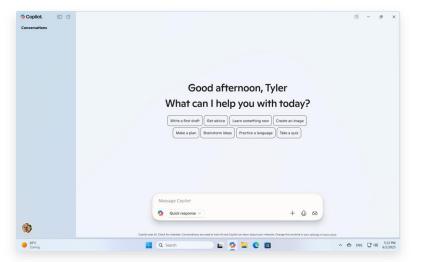
Widgets Board



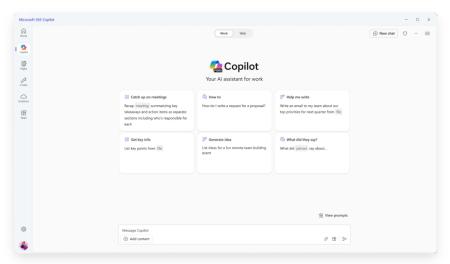


Al on Windows

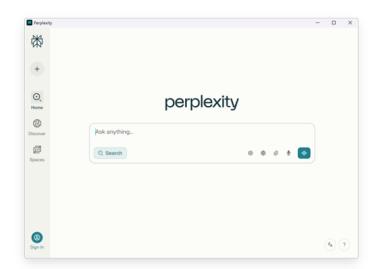
AI Applications running on Windows



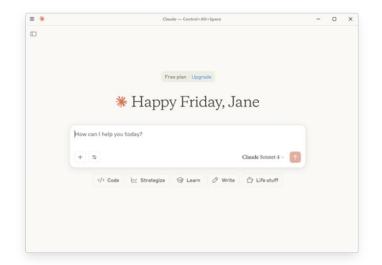
Microsoft Copilot (for consumers)



Microsoft M365 Copilot (for work)



ChatGPT
Cha



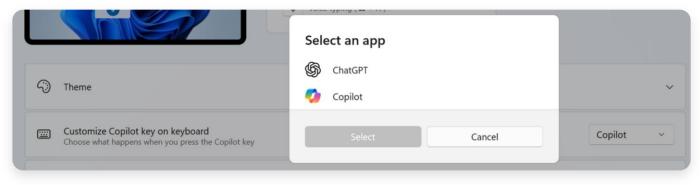
Perplexity AI

OpenAl ChatGPT

Anthropic Claude

Copilot hardware key configurability





Applications shown in order of most recently installed

Running AI models locally on Windows

Windows AI APIs

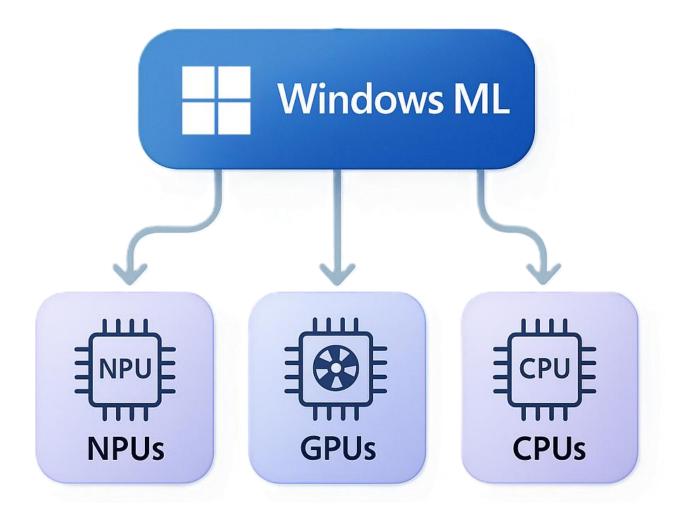
 Ready-to-use AI APIs powered by ondevice models. Enable AI capabilities without the need to find, run, or optimize your own model.

Foundry Local

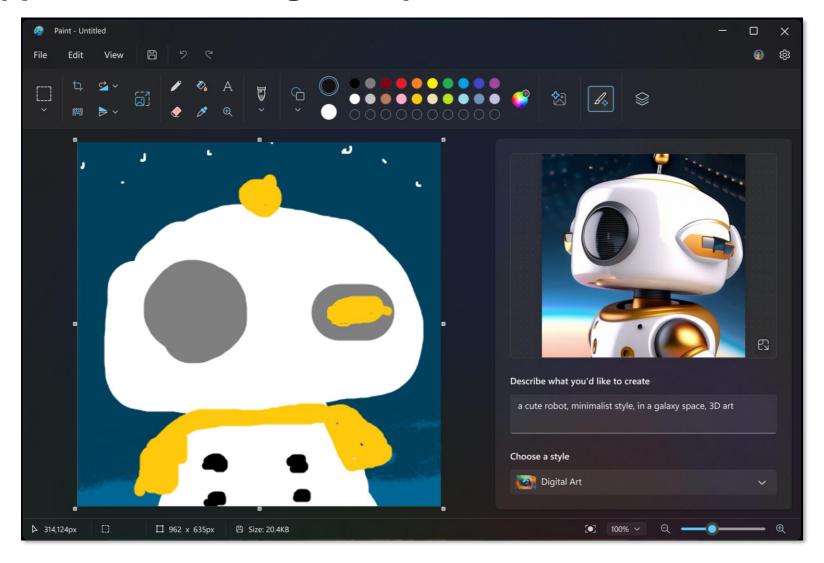
• Find and integrate popular open-source language models that run locally.

Windows Machine Learning (ML)

 Bring your own model and let Windows run it on the NPU, GPU or CPU.



Microsoft applications running on Copilot+ PCs use Windows AI features



Cocreator in Microsoft Paint allows you to create amazing artwork with the help of Al.

Windows features use AI technology to help users to complete tasks

Recall

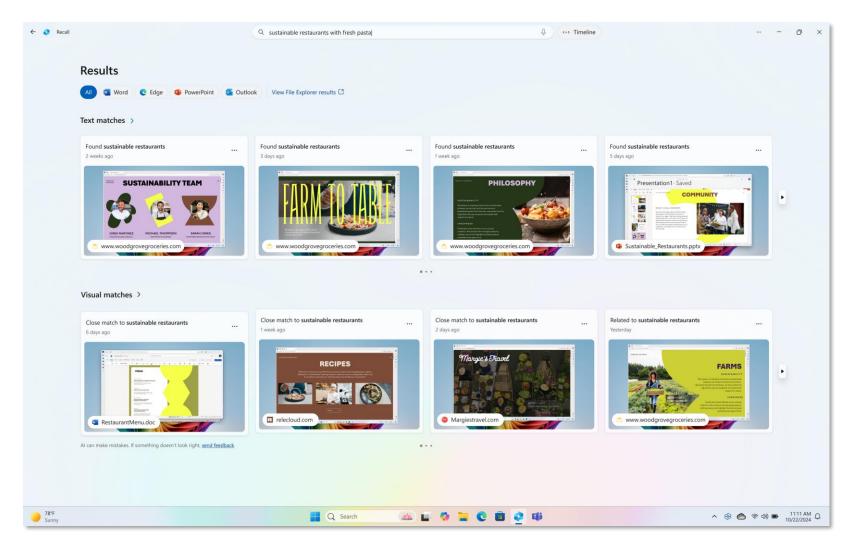
 Retrace your steps to quickly and securely find and get back to an app, website, image or document.

Click to Do

 Recognize and act on text or images you see on screen.

Local semantic file search

 Describe what you're looking for and Windows will understand and find it for you.



Recall search results for "sustainable restaurants with fresh pasta"

Thank you

Rules for the Q&A

- When taking the floor always state your **name and organisation** (in room and via **slido**)
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