Survey on the personalisation of European consumers' online experience in preparation for the Digital Fairness Act

NEXTRADE GROUP
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I. Introduction

The European Union (EU) is advancing toward a new initiative, the Digital Fairness Act, which is expected to address practices such as the so-called 'dark patterns' online, among others. Dark patterns are deceptive design elements used in user interfaces of apps and websites to trick users into sharing data they might not want to share or into making choices and purchases they might not otherwise make.

In 2024, the EU published a Digital Fairness Fitness Check to gauge the prevalence of dark patterns in Europe and consumers' views on them. Subsequently, in July 2025, the European Commission launched a three-month consultation on the main aspects of the forthcoming Digital Fairness Act.

The issues the Digital Fairness Act seeks to tackle are not new: the EU has addressed dark patterns, along with various manipulative and deceptive practices, in its many digital and consumer protection regulations.

As the discussion on the Digital Fairness Act continues, it is important to note that businesses operating in Europe gather and use data on consumers' online behaviours and preferences every day, in order to be able to offer consumers a more personalised online experience.

Such legitimate efforts to provide users with interfaces, services, and offerings tailored to their preferences have been found in multiple studies to enhance European consumers' sense of convenience and reduce their cognitive load and the complexity of online search.

Personalisation is also widely catalogued to benefit businesses, including European small and medium enterprises (SMEs), helping them promote consumer trust, engagement, and repurchases, as well as expand the customer lifetime value. In a 2025 survey of across 13 European countries, 86 percent of SMEs attributed their growth in revenue directly to personalised digital advertising.[1]

This paper describes the results of a new survey with 10,500 European consumers in 12 countries that was fielded in preparation for the European Commission's public consultation on the Digital Fairness Act. The survey provides new data on the impacts of personalisation on European consumers. It also takes stock of European consumers' understanding of, and level of comfort with, businesses' use of consumers' data to create personalised experiences, as well as consumers' perceptions of how common dark patterns are online.

[1] Center for Information Policy Leadership, Public First, and Google (2025).

The survey reveals that:

- Over 70 percent of Europeans find personalised services valuable, especially in terms of saving time and improving customer experience.
    - Over a third, or 35 percent, favour or strongly favour getting personalised services, even if it means that online services use their data, while 41 percent are indifferent; only 24 percent oppose or strongly oppose.
    - Over 85 percent of consumers understand and accept the data tracking that underpins personalisation.
    - In a common way to measure consumers' welfare gains from digital services, the survey finds that 71 percent of European consumers would even be willing to pay more for personalised services, especially for personalised streaming and marketplaces. This indicates that personalisation enhances Europeans' welfare.
- The survey reveals that deceptive practices are not sustainable business practices in Europe.
    - European consumers are quick to act against brands that deceive or manipulate, by stopping to purchase from them, recommend them, or visit their sites.
    - As many as 79 percent would be willing to pay a premium for online services that are transparent and fair.
- While 70 percent of Europeans report experiencing dark patterns in at least some digital industries such as travel booking or ride hailing, for over one-half, the presumed dark patterns were not seen as pervasive, but, rather, concentrated in a "few services" in a given industry.

A dashboard with some of the survey results can be found here.

The following section reviews literature on the impacts of personalisation on consumers, firms, and economies. Section three reviews the results of the survey, while section four concludes.

II. What we know about gains from personalisation, dark patterns and implications to the Digital Fairness Act

Personalisation isn't just occurring online – it is woven into our everyday offline lives as well. In the morning, you make yourself a coffee at home with your preferred beans. You then go into work taking your bike or car, which are personalised to your favourite colour and include features you prefer, like a child seat or a sunroof. At lunch, you meet a friend at a restaurant that caters to your preferences. After work, you go to the gym and follow a workout plan that is personalised to your progress and goals. For dinner, you order your favourite takeaway and have it delivered directly at your doorstep.

Personalisation has been part of the European economy ever since village shopkeepers and artisans knew their customers by name, understood their preferences, and tailored their services accordingly.[2] Personalisation also overpowered the scale economies of the 20th century's standardised offerings of mass department stores. Digitisation and the ability to collect and analyse vast amounts of customer data has enabled personalised retail experiences across the customer journey, starting with such innovations as the 1998 Amazon recommendations engine and Netflix's 2000 "Cinematch."[3]

The gains from personalisation are quite widely analysed. The following chapter reviews existing research and survey data.

a. Gains from personalisation of online services

Personalisation has proliferated because consumers demand it and reward businesses for it. Numerous academic studies indicate that personalisation reduces consumers' cognitive load, provides shortcuts that save consumers time and helps consumers locate products with lower costs – and is especially effective when consumers are aware about personalisation and trust the vendor.[4]

Recent surveys attest to European consumers' interest in personalised experiences and services. In a 2023 survey of 2,000 German and UK consumers, nearly two-thirds said they expect a curated shopping experience from the brands with which they shop regularly.[5] A 2024 survey of 7,343 European and UK consumers found that 80 percent regard it as "cool" that a brand would recommend products that align with the consumer's past purchases, and 85 percent found it "cool" to receive a personalised birthday offer, compared to just 20 percent and 15 percent that found these actions "creepy".[6] Personalised ads are also seen as superior to high volumes of communications. A 2025 IAB survey of more than 10,000 Europeans found that 80 percent of consumers prefer fewer but more personalised and relevant ads.[7]

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[2] Pine and Gilmore (1993, 1999).
[3] Biddle (2021).
[4] See for example, de Pechpeyrou (2009); Li and Unger (2012); Chellappa and Sin (2005); De Keyzer et al. (2015); Kwon and Kim (2012); Onibokun et al. (2023). For literature reviews, see Casaca and Miguel (2024) and Chandra et al. (2022).
[5] Tolliver-Walker (2023).
[6] Marigold (2024).
[7] IAB Europe (2025).

Personalisation can be conceptualised as consumers and brands "co-creating" a personalised experience, for example through customer reviews, purchase data, and social media interactions.[8] European consumers are increasingly comfortable with the use of personal data to create personalised experiences and ready to handle the perceived trade-off between personalisation and privacy.[9] In a recent survey, 46 percent of European consumers said they are comfortable with brands using personal data like name, age, and location to offer a better experience.[10] Further consumer surveys have found that consumers are comfortable with sharing data about themselves to create a customised experience.[11]

A strong majority of consumers find the exchange of some data for a personalised experience acceptable: in the IAB survey, upon learning that advertisers pay more for personalised ads, 60 percent of consumers saw their consent as a fair value exchange. This comfort may stem in part from consumers' actions to ensure their data is protected: more than 50 percent have recently deleted unused mobile apps and browser extensions, and a third have tightened the privacy settings on their online accounts.[12]

Businesses that personalise perform better. Personalised product recommendations, communications, and individualised promotional offers help businesses build consumer trust, promote engagement, catalyse repurchases, and have lower return rates.[13] According to a recent survey from NTT, over 90 percent of consumers are more likely to purchase from brands that remember them and provide relevant offers.[14] Personalised recommendations help lower customer acquisition cost, reduce churn, and enhance lifetime value of the customer.

Personalisation can also help level the playing field between large and small firms. In a survey of 4,287 European SMEs across 13 countries, 86 percent of SMEs attributed revenue growth directly to personalised digital advertising.[15] As many as 76 percent of European SMEs agreed that personalised ads enable them to compete with larger businesses, while 73 percent said it would be impossible or difficult to find customers without personalised advertising.[16] Another report found that personalised advertising secures €100 billion each year in additional sales for European businesses, contributing €25 billion to GDP and supporting 570,000 jobs.[17] Asked about the impacts of regulations that might limit responsible data use, almost one-half of EU SMEs said they would increase prices, and 21 percent feared they would even have to cut staff to compensate for increased costs and lost revenue.[18]

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[8] Weng Marc Lim et al. (2021).
[9] See, for example, Li and Unger (2012).
[10] MoEngage (2023).
[11] See, for example, Marigold (2024) and BCG Global (2024).
[12] Wakefield (2025).
[13] See Kalaignanam et al (2018); Korganbekova and Zuber (2023); Tyrväinen et al. (2020); Madhuri et al. (2024); Shin et al. (2020).
[14] Adobe Communications Team (2023).
[15] Center for Information Policy Leadership, Public First, and Google (2025)
[16] Ibid.
[17] Implement Consulting Group and Google (2025).
[18] Center for Information Policy Leadership, Public First, and Google (2025).

Conversely, lack of personalisation, for example due to privacy restrictions affecting data quality, can compound frictions in online transactions and lead to lower-quality recommendations, decrease consumer welfare, and result in revenue loss for smaller sellers and niche offerings.[19]

All in all, recent surveys suggest that European consumers are concerned about how their data is used – but also ready to share their personal data in exchange for relevant and personalised services and ads. For European SMEs, personalisation is crucial as it helps drive revenue and customer loyalty.

Research is still nascent on how AI-driven personalisation might impact customer loyalty across the customer journey.[20] Nevertheless, a recent report does offer a glimpse, estimating that generative AI-powered ads could create €250 billion in additional sales for EU businesses.[21]

b. What do we know about dark patterns?

It is important to recognise that there are legitimate concerns around misuse of consumer data and dark patterns that are aimed at manipulating consumers into handing their data and leading them toward certain choices that do not necessarily align with their preferences. [22]

Research on dark patterns has expanded since the term was coined in 2010 by UX designer Harry Brignull.[23] The definition for dark patterns is not uniform or crisp but varies across studies. That aside, studies have found dark patterns to be prevalent online. For example, a comprehensive 2024 review that examined 642 websites and apps offering subscription services worldwide found that 76 percent of these platforms used at least one dark pattern, with 67 percent using multiple putatively deceptive tactics.[24] A European Commission mystery shopping study found dark patterns on 97 percent of popular websites and apps, such as auto-renewal for subscriptions and forced registration.[25] Also the OECD has found dark patterns to be prevalent.[26]

Assessments of the actual impact of dark patterns yield diverging results, in part due to different definitions and methodologies.[27] For example, a European Union study and some scholars have found that some segments such as children, the elderly, and people with disabilities are especially vulnerable to dark patterns, and that educated internet users and working professionals may be better placed to file complaints against perceived abuses.[28] However, other studies have

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[19] Korganbekova and Zuber (2023).
[20] Hardcastle, Vorster, and Brown (2025).
[21] Implement Consulting Group and Google (2025).
[22] For a review, see Zhang and Wang (2025). See also Luguri and Strahilevitz (2021); Bösch et al. (2016). For a meta-analysis, see Colin M Gray et al. (2023). For approaches to classification of dark patterns, see Meng Li et al. (2018) and Luguri and Strahilevitz (2021)
[23] The term "dark pattern" was first coined in 2010 by Dr. Harry Brignull, PhD in Cognitive Science, who defines them as "tricks used in websites and apps to make you do things that you didn't mean to."
[24] Federal Trade Commission (2024). See another recent mapping in Mathur et al. (2019).
[25] European Commission: Directorate-General for Justice and Consumers, Lupiáñez-Villanueva et al. (2022).
[26] OECD (2024).
[27] For a discussion, see Gray et al. (2023).
[28] Directorate-General for Justice and Consumers (European Commission) et al. (2022). See also, Koh and Seah (2023); Rossi et al. (2024). The French data protection authority's data on complaints show that most complainants

disputed these findings, arguing that individuals across all groups are susceptible to dark patterns.[29]

Overall, academic literature on both the classification and impacts of dark patterns is still nascent and offers mixed results. There are disagreements on what exactly a dark pattern is and how it can be distinguished from positive nudges and personalised offers that consumers may in fact enjoy.[30] There is also a gap in academic research on the long-term performance of brands and online services that employ dark patterns – though emerging surveys and industry literature suggest that abuses and deceitful practices are not sustainable, as they erode consumer trust, damage brand reputation, and lead to increased regulatory scrutiny and fines.[31]

c. Implications of the Digital Fairness Act

As the EU looks to pursue the Digital Fairness Act, there are fundamental questions about the potential trade-offs between regulating online service further and enabling data-driven personalisation that enhances Europeans' digital lives and SMEs' profitability.

The Digital Fairness Act should be considered carefully: numerous studies by now indicate that EU's digital and consumer protection regulations have created significant new costs for consumers, and reduced businesses' ability to reach customers and personalise services for them. While the General Data Protection Regulation (GDPR) is widely analysed, other European digital policies have also started to receive increased attention. For example:

- The GDPR has been found to complicate e-commerce transactions by making firms use privacy notices and obtain consent for data processing. This has led to decreased page views and traffic to European websites and made online searches less efficient.[32] Website page views and website revenue per European user have dropped by 12 percent after the GDPR's enforcement.[33]

- Frictions caused by the GDPR reduced European business profits by 8 percent and sales by 2 percent.[34] For example, in reaction to the GDPR raising the cost of firms' data storage, European firms decreased their data storage by 26 percent and data processing by 15 percent relative to comparable U.S. firms, thereby becoming less data intensive.[35]

- The DMA has also introduced further barriers online. A recent survey with 5,000 Europeans on the impacts of the DMA shows that majorities of Europeans report new complexities in online searches and 61 percent of Europeans report having to search up to 50 percent longer for relevant online content than before the DMA came into force.[36]

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in 2021 had a higher level of education, which may be correlated to the digital skills that are needed to submit complaints online. See Le Laboratoire d'Innovation Numérique de la CNIL (2022).

[29] See, for example, Zac et al. (2025).

[30] Bielova et al (2023); Gray et al. (2023).

[31] See, for example, Sukhorukov (2025).

[32] Goldberg et al. (2024) ; Schmitt et al. (2021); Zhao et al. (2021).

[33] Ibid.

[34] Presidente and Frey (2022).

[35] Demirer et al. (2024).

[36] Nextrade Group (2025).

- A 2025 study found that the DMA would entail a 0.64 percent annual loss on European business' turnover as a result of what consumers experience – lower visibility, more limited personalisation, reduced reach, higher transaction costs, and the loss of valuable platform integrations.[37] The most impacted sectors include accommodation and retail, with annual revenue losses up to €1,122 per worker, depending on the intensity of digital service use.

- The AI Act is also expected to entail a total compliance cost of €6.6 billion for the global AI industry and €1.45 billion for the European AI industry in 2025.[38]

European think-tanks and business associations have echoed these concerns. For example, a 2025 ECIPE report argues that digital regulations have limited technology adoption and productivity growth in Europe.[39] DigitalEurope discovers multiple cases of overlapping and contradictory regulatory requirements.[40] The European Research Council argues that Europe needs to "replace growth-hampering regulation by smart regulation."[41]

These findings make it very important for the Digital Fairness Act to be designed in a way that will not further burden European businesses and undermine consumers' online lives. The Act should adhere to the principles of EU competitiveness and the simplification agenda and avoid over-regulation.

The following sections seek to provide further empirical evidence into the discussions on the Digital Fairness Act's design, by presenting survey data on European consumers' perceptions about dark patterns and the benefits from personalisation for Europeans. Another forthcoming study reviews how EU's existing laws already address dark patterns.

[37] Cennamo et al. (2025).
[38] European Commission: Directorate-General for Communications Networks, Content and Technology et al. (2021).
[39] Guinea and Sharma (2025).
[40] Digital Europe (2022). Pelkmans (2024) highlights an irony – that while the single market aims to eliminate regulatory burdens, sector-specific regulations and their often-inconsistent implementation across member states can lead to new forms of fragmentation and increased costs for businesses seeking to scale across the EU. Indeed, the IMF estimates that there are many intra-EU barriers with a tariff equivalent of about 44 percent on average for goods trade, or three times higher than trade barriers between US states. For services, these estimated barriers are even steeper, equivalent to a 110 percent tariff. See Kammer (2024).
[41] Tirole and Leptin (2025).

III. How European consumers value personalisation: Ten findings from the survey

This section focuses on new empirical evidence on European consumers' perceptions about dark patterns and their benefits from personalisation. It is based on an online survey of 10,500 European consumers fielded between 24 June and 10 July 2025 in 12 EU Member States (see appendix 1 for the sample).

The survey captured consumers' characteristics (age, geolocation, education level, intensity of online service use, etc.) and their online behaviours, preferences, views on personalisation, and concerns regarding different manifestations of dark patterns. A dashboard with some of the survey results can be found here.

The survey assessed the personalisation of online services that consumers in all segments and age categories are likely to frequent (e.g., e-commerce, social media content, educational services, financial services, and travel services) as well as consumers' perceptions over personalised experiences. As such, it went well beyond assessments on the personalisation of digital ads.

Also, unlike the Commission's Digital Fairness Fitness Check report, which only sought to assess European's views on dark patterns and regulations, this survey analysed both how Europeans deal with presumed unwelcome practices that they encounter online, and what their views are on personalisation.

Ten key findings resulted from the consumer survey, as follows.

1. Most consumers experienced some dark patterns over the past year

Europeans do notice and get irritated by dark patterns. The most typical dark patterns Europeans experience include a requirement to have an account (48 percent had experienced at least five times in the past year), cookie or consent banners that are complicated to refuse (43 percent), activity messages such as "25 people are reading this right now" (37 percent), and free trials in exchange for confirmation of payment details (32 percent) (figure 1). Some 30 percent of consumers surveyed had experienced at least five times so-called 'urgency' – such as fake or misleading countdown timers or statements – and 27 percent had faced hard-to-cancel subscriptions.

On a scale of 1 (dark patterns are not problematic and can be ignored) to 10 (dark patterns make it very difficult to enjoy online experiences), 46 percent of Europeans that use the internet four or more hours per day (73 percent of the respondents) considered that dark patterns are something they can live with, giving a rating of 1-5. On the other side of the spectrum, 32 percent gave a rating of 6 or 7, and 20 percent a rating of 8-10 (figure 2).

Figure 1 - Share of consumers that use the internet intensively reporting experiences online in the past year

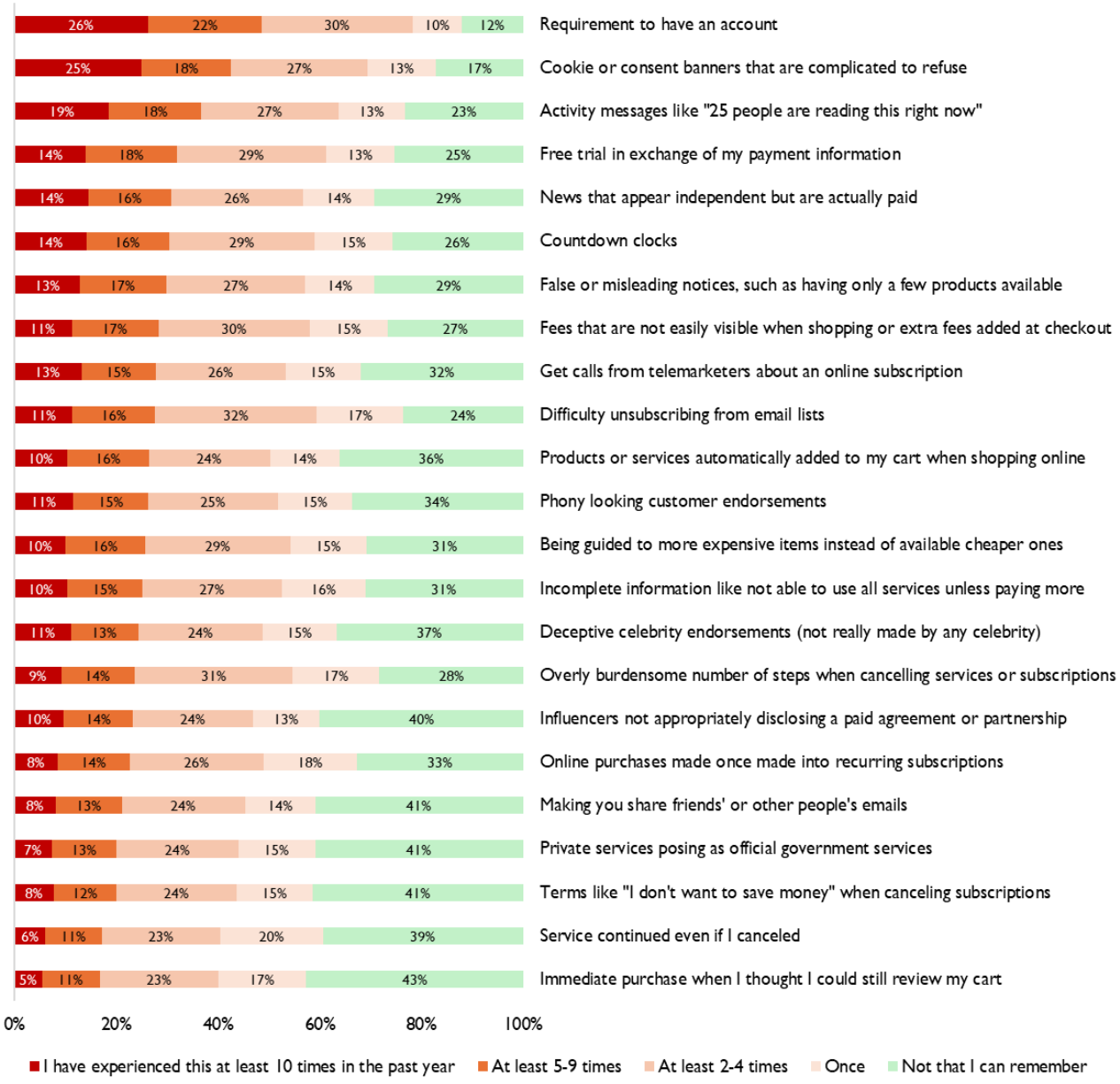
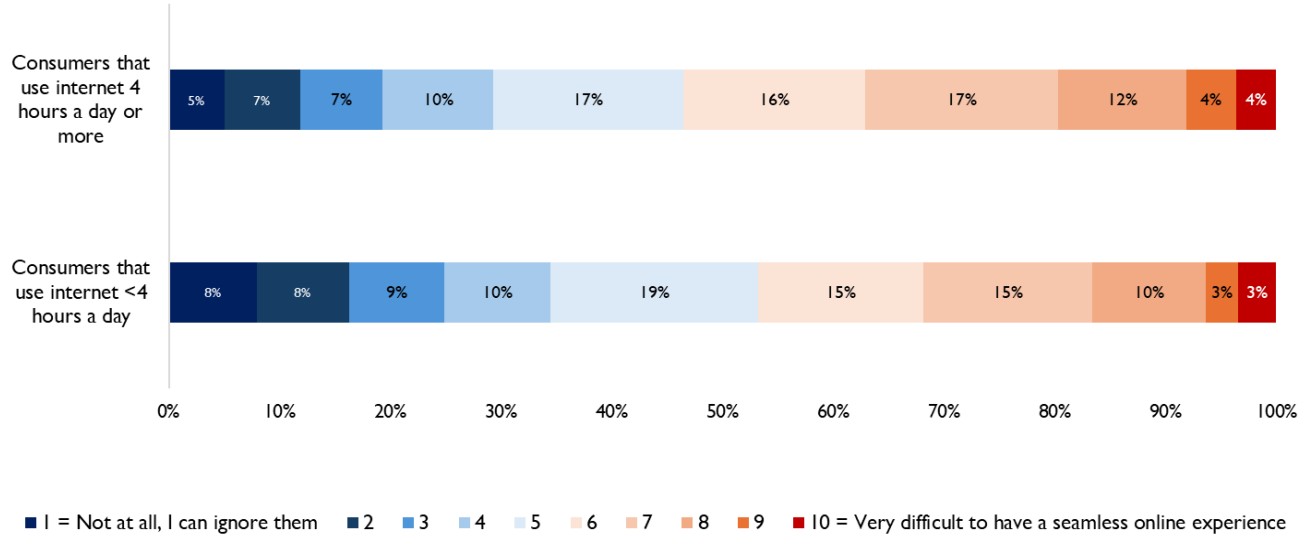


Figure 2 - Impact of tactics on consumers' enjoyment of their digital life (1=not at all problematic; 10=very difficult to have a seamless experience)

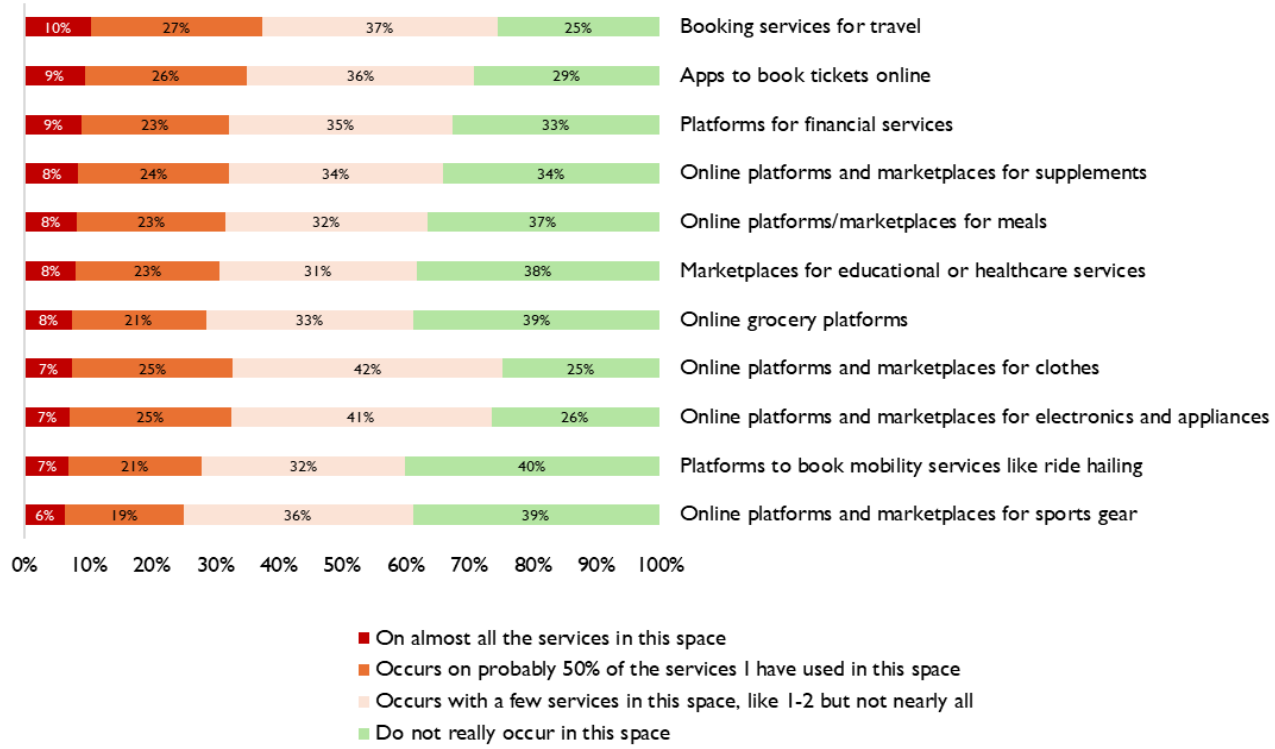


2. However, dark patterns are not pervasive across the online ecosystem, but, rather, concentrated on 1-2 key platforms, and experienced 2-4 times per year

Europeans that use the internet intensively (i.e., those 73 percent of Europeans who use the internet four or more hours per day) experience these patterns most typically on online marketplaces for clothes (74 percent had experienced them in the past year), travel booking services (74 percent), and marketplaces for electronics and appliances (73 percent) (figure 3).

However, dark patterns are not pervasive across online services. In most cases, about two-thirds of Europeans report either not experiencing them at all or experiencing them only on 1-2 online services per vertical, such as with 1-2 online marketplaces for clothes.

Figure 3 - Frequency of dark patterns experienced



3. European consumers act against dark patterns, punish misbehaving services by refusing to continue buying from deceptive brands

Europeans across income groups readily take action to counter manipulative practices. For example, out of the cohort of Europeans with below average incomes (less than €40,000 yearly), 92 percent had unsubscribed from unwanted email lists in the past year (with 42 percent having done so five or more times), 77 percent had disabled cookies to limit data tracking, 76 percent had unsubscribed from paid services they found deceptive, and 65 percent had left a negative review (figure 4).

In addition, misbehaving brands and services may be able to continue conducting business for a while but not in the long-run: 76 percent of below-average income respondents and 79 percent of above-average income consumers reported stopping their subscription to services with a deceptive design (and over 20 percent did so at least five times).

These measures are common: some 60 percent of respondents took them at least six times per year, once every two months (figure 5).

Figure 4 - Share of consumers that took actions in the past year, by income level

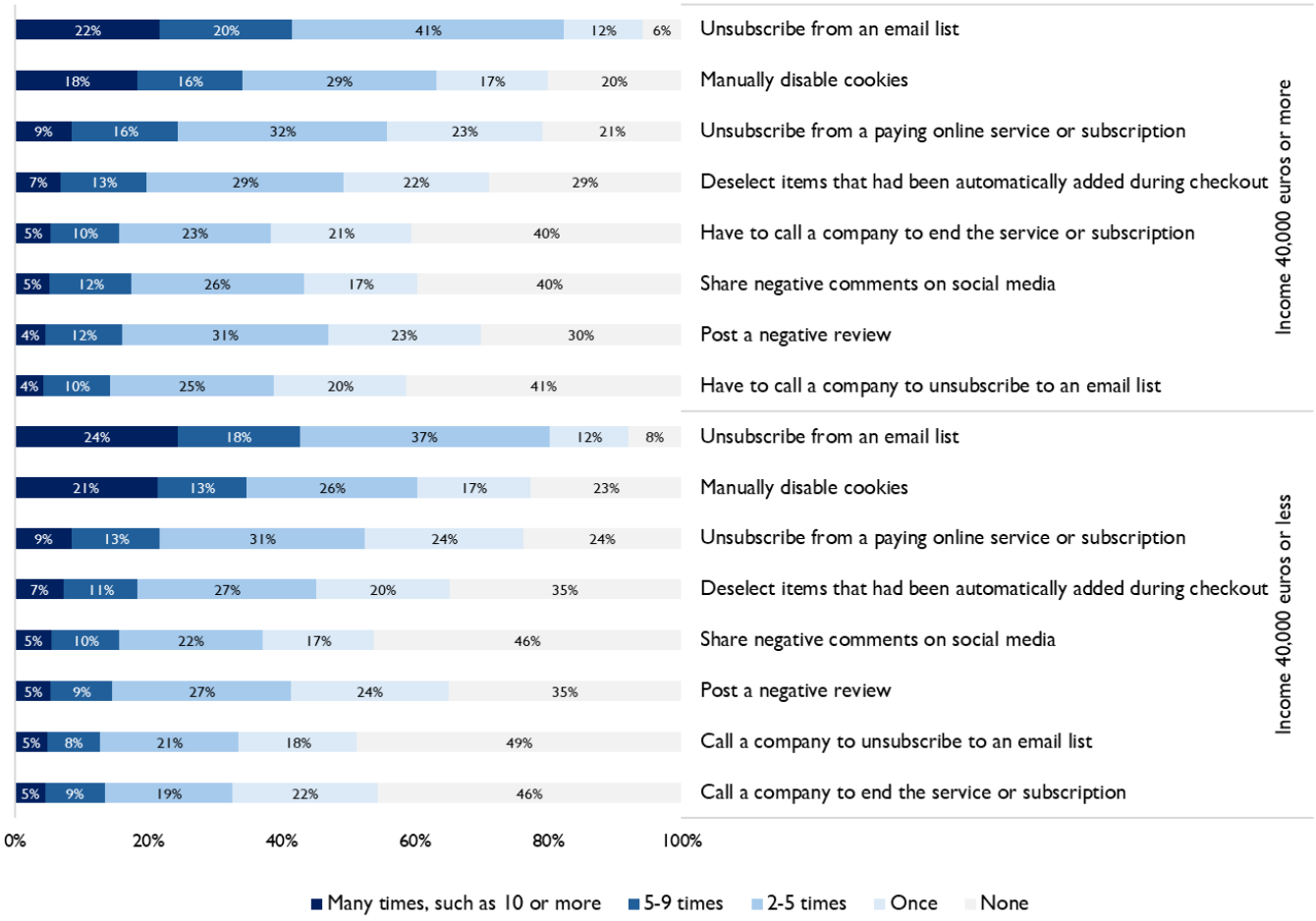
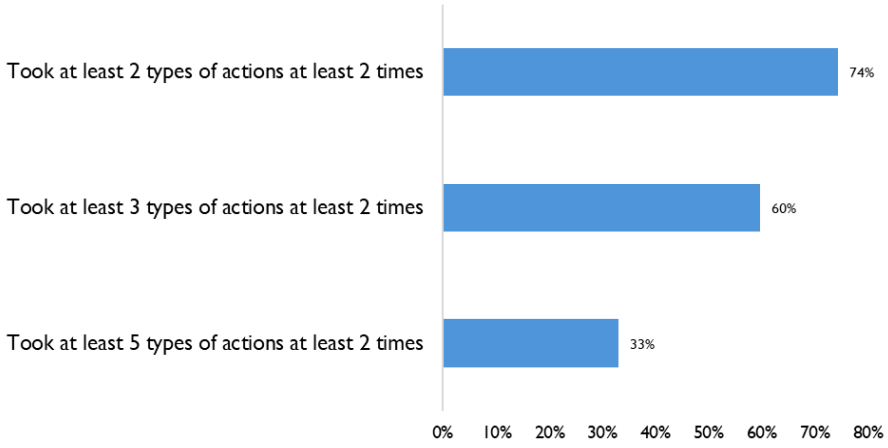
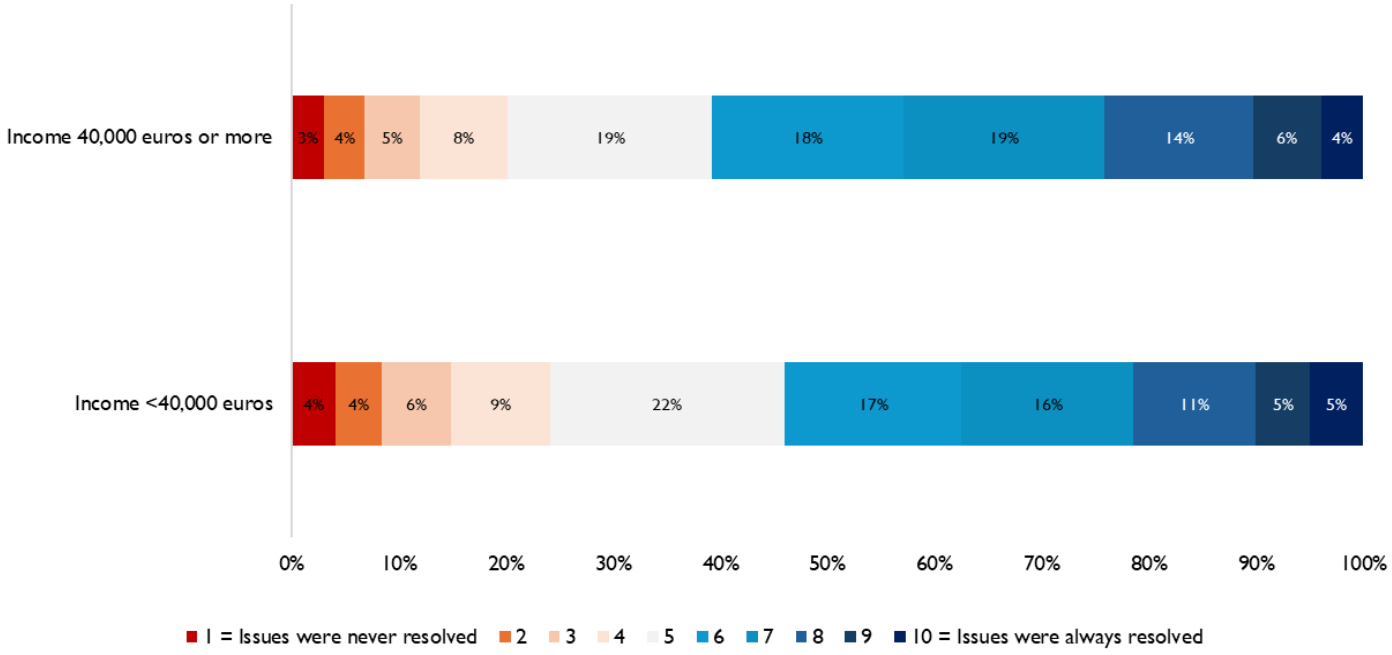


Figure 5 - Share of consumers that took actions at least twice in the past year



Consumers also get recourse: asked on a scale from 1 (issues were never resolved) to 10 (issues were always resolved), 55 percent of respondents with a below-average income of less than 40,000 euro scored 6-10, as did 61 percent of above-average earners (figure 6).

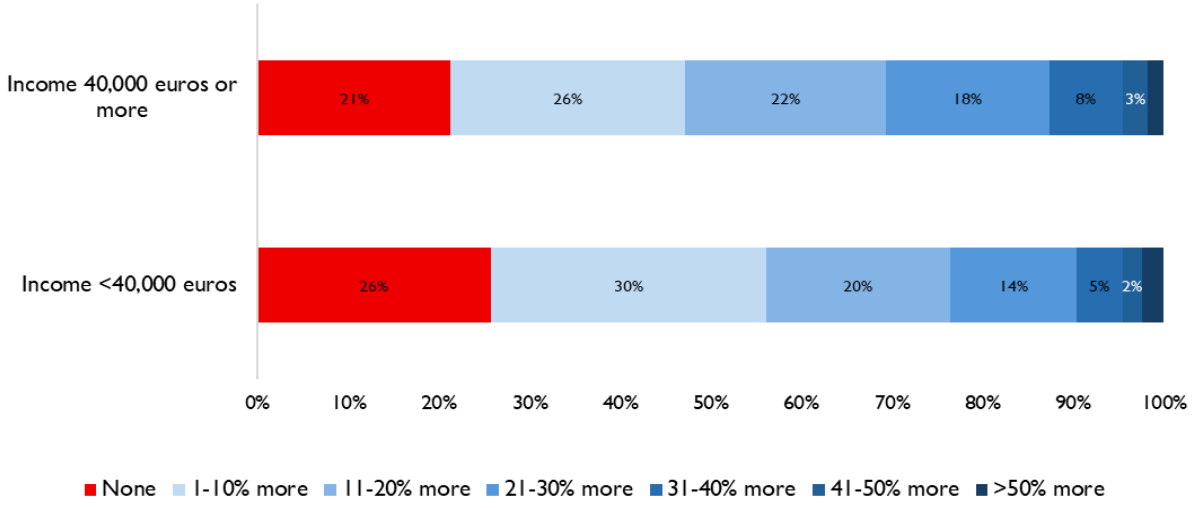
Figure 6 - Satisfaction of resolved issues, by level of income (1 = issues were never resolved; 10 = issues were always resolved)



4. Consumers reward brands that are transparent and fair

Moreover, consumers reward fairness: over one-half – 53 percent – of above-average income Europeans would be ready to pay over 10 percent more for a brand or service that is considered transparent and fair, and 30 percent would be prepared to pay a premium of 30 percent or more (figure 7). For below-average consumers, these figures are very similar, 44 percent and 21 percent, respectively.

Figure 7 - Premium Europeans would be willing to pay for a brand or service that clearly tries to be transparent and fair, by consumer's income

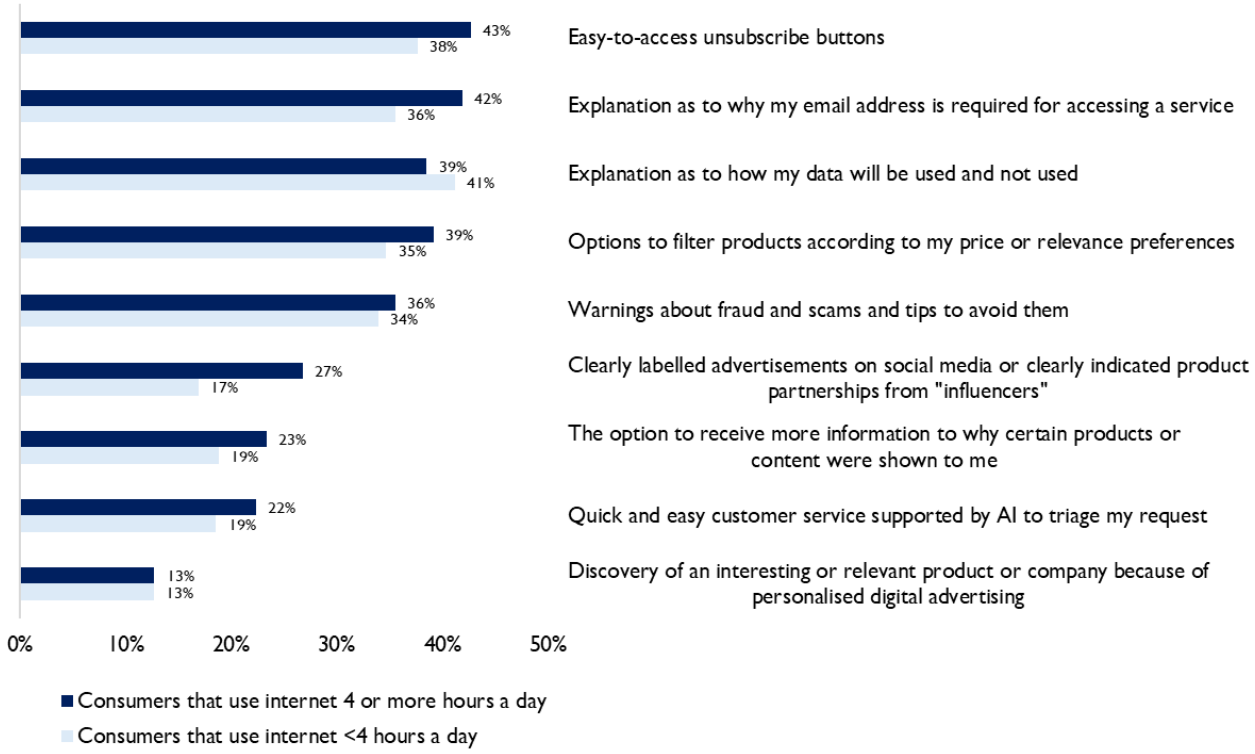


5. Consumers reported observing many positive patterns online over the past year, such as transparency and fairness

European consumers have observed positive trends online in the past year. Easy-to-access unsubscribe buttons were the most frequently observed improvement, reported by 43 percent of intensive internet users and 38 percent of less intensive users (figure 8). Similarly, a significant share of intensive and less intensive internet users noticed clearer explanations for why email addresses are required (42 percent and 36 percent, respectively) and how their data will be used (39 percent and 41 percent).

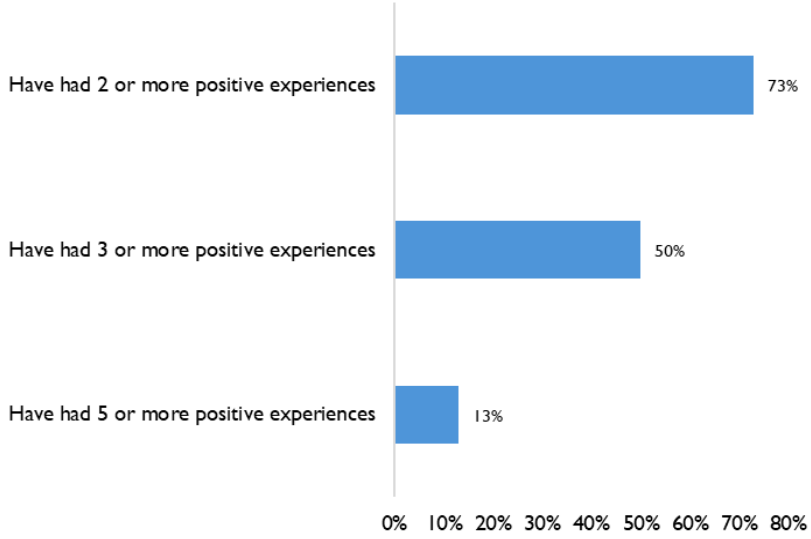
Other widely reported positive trends include options to filter products by price or relevance (39 percent of intensive users and 35 percent of less intensive users); fraud warnings (36 percent and 34 percent); clearly labelled social media ads and influencer partnerships (27 percent and 17 percent), and additional information on why products or content were shown to them (23 percent and 19 percent).

Figure 8 - Share of consumers that have observed positive trends online in the past year, by intensity of using the internet



Overall, one-half of the respondents stated they experienced at least three of these positive changes in the past year and 73 percent reported at least two such experiences (figure 9).

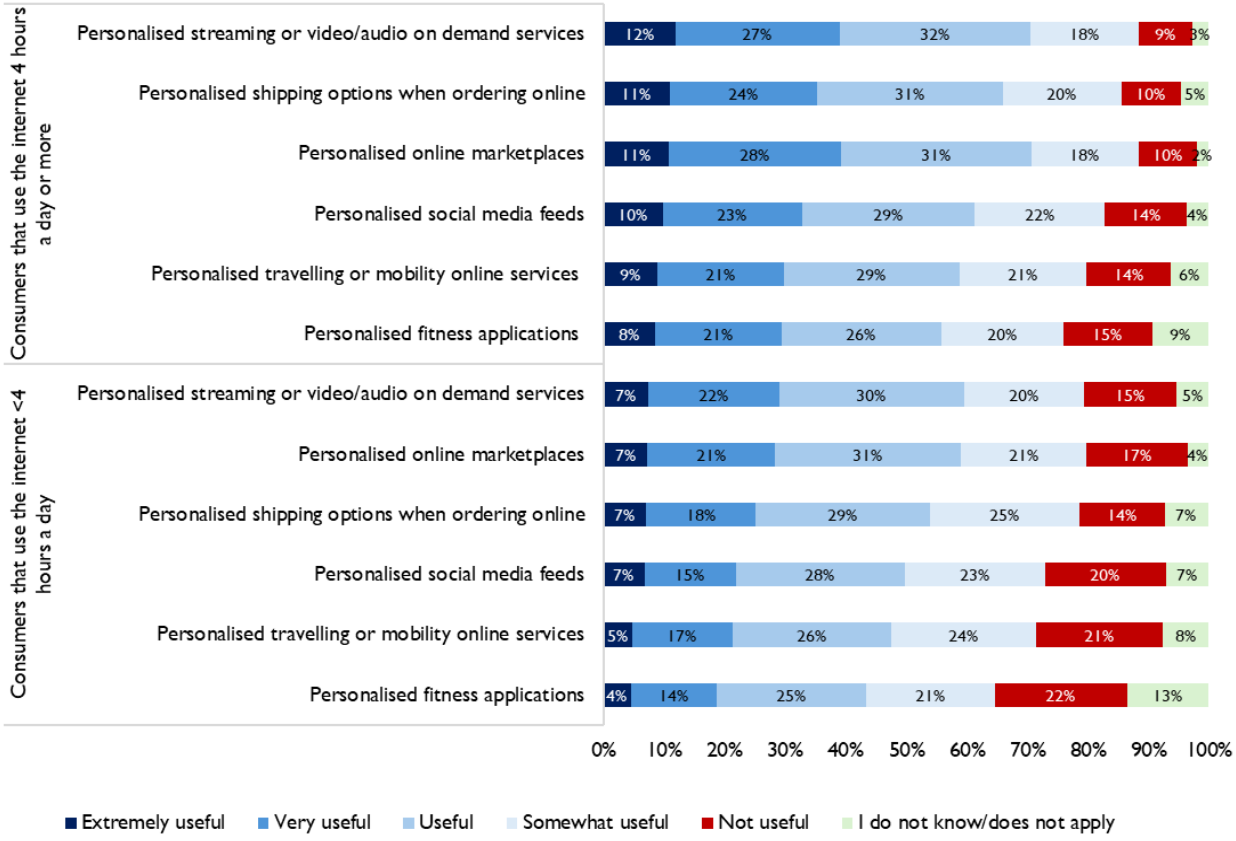
Figure 9 - Share of consumers that have had several of these positive experiences



6. Personalisation of online services is highly useful for Europeans to enjoy their digital lives, and saves them time and improves user experience

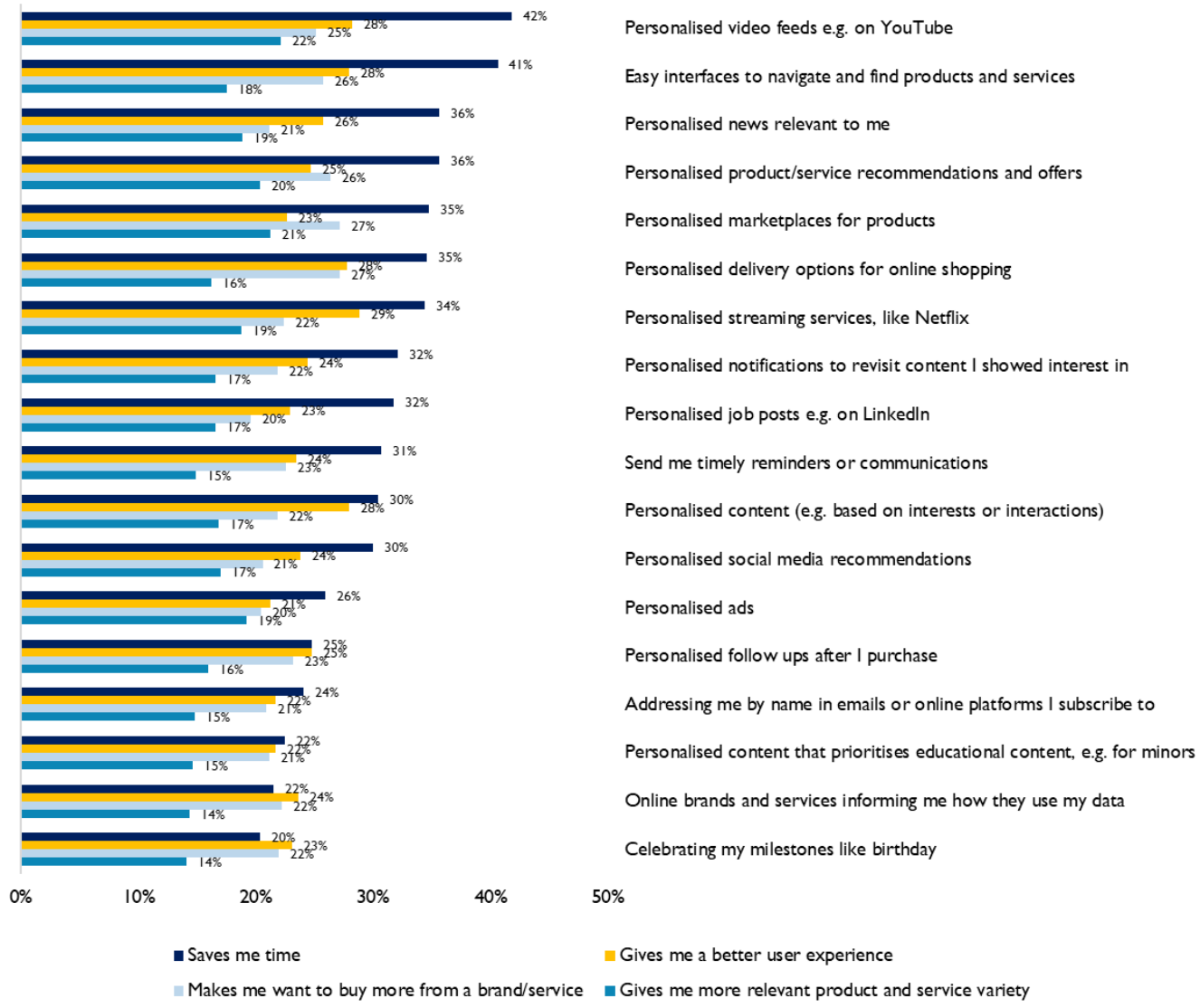
Seventy-one percent of consumers that use the internet intensively find personalised streaming, video, or audio on demand services "useful", "very useful" or "extremely useful" (figure 10). In addition, 70 percent find personalised marketplaces useful, very useful, or extremely useful. Sixty-two percent say this about personalised social media feeds, as do 59 percent about personalised mobility services. Among less intensive internet users, 59 percent found personalised marketplaces and personalised streaming, video, or audio on-demand services useful, very useful, or extremely useful.

Figure 10 - Usefulness of personalisation of online experiences, by intensity of using the internet



Consumers frequently describe personalisation as saving time: 42 percent say so of personalised video feeds, 41 percent of personalised online interfaces that help them navigate to relevant products and services, and 36 percent of personalised news (figure 11). About a quarter of consumers also find that personalisation in these various areas enhances user experience and makes them want to buy more from a service.

Figure 11 - Selected value propositions of personalisation of online experiences for Europeans



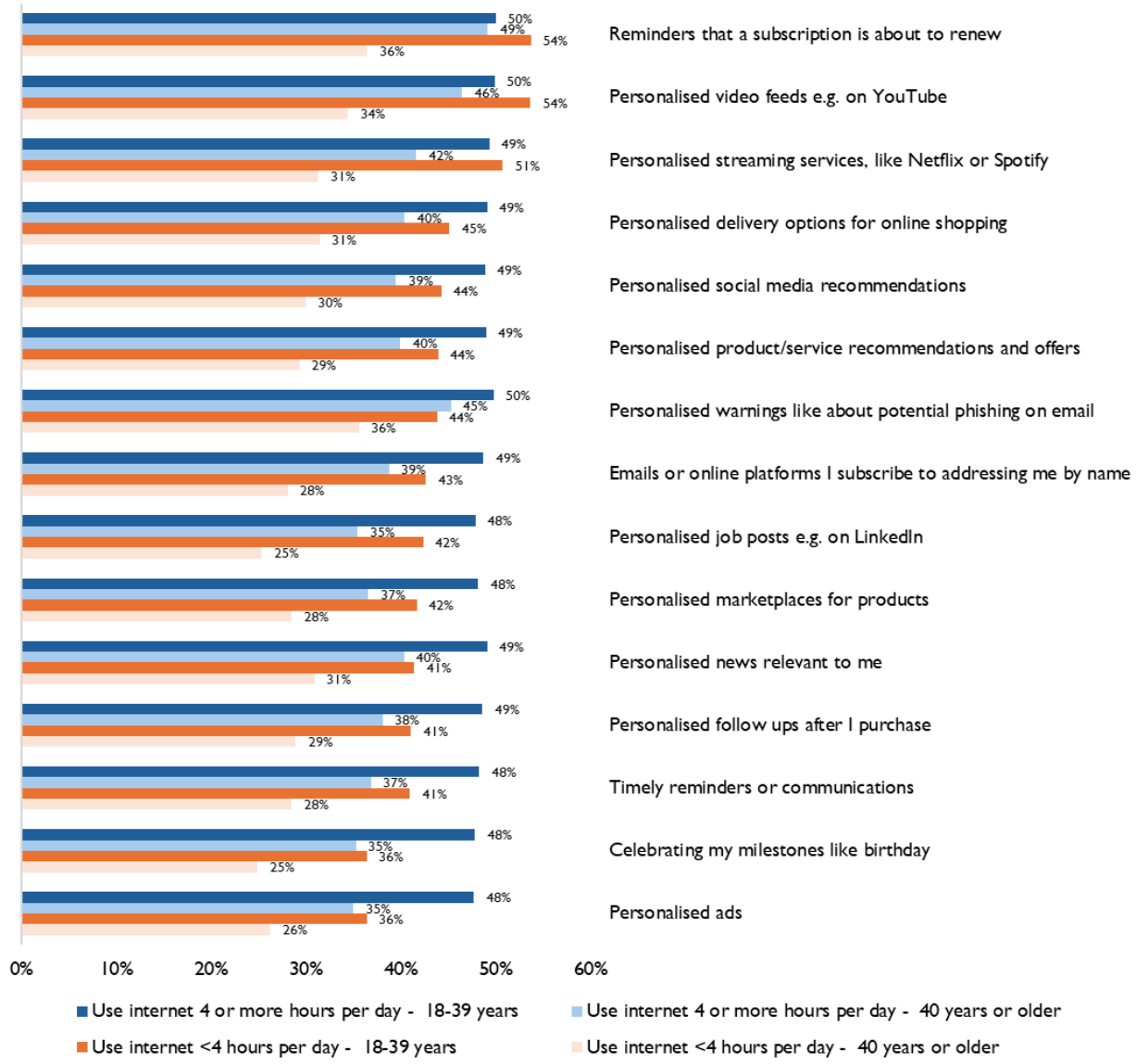
7. Majority of Europeans agree that their online experience would be undermined in the absence of personalisation

When asked whether their enjoyment of online services would be "undermined" or "significantly undermined" without personalised features, especially younger Europeans below 40 years of age noted they would be impacted. Among the most valued features, 50 percent of younger intensive users of the internet said their enjoyment of online services would be "undermined" or "significantly undermined" without personalised reminders that a subscription is about to renew (figure 12). Streaming services were also seen as critical, with 49 percent of younger intensive users saying their experience would be undermined without them, compared to 42 percent of older intensive users.

The lack of personalised social media recommendations – such as prompts to view another person's photos or videos – would undermine online experience for 45 percent of younger intensive users. Thirty-nine percent of older intensive users (over the age of 40 and using the internet four hours or more per day) felt similarly.

Personalised product and service recommendations were also considered important: 44 percent of younger intensive users said their online experiences would be undermined without them, as did 40 percent of older intensive users. Phishing alerts tailored to individual users were cited by 49 percent of younger intensive users as essential to their online experience, while 45 percent of older intensive users agreed.

Figure 12 - Share of consumers who believe the value of online services and apps would be "undermined" or "significantly undermined" without personalisation, by intensity of using the internet and age

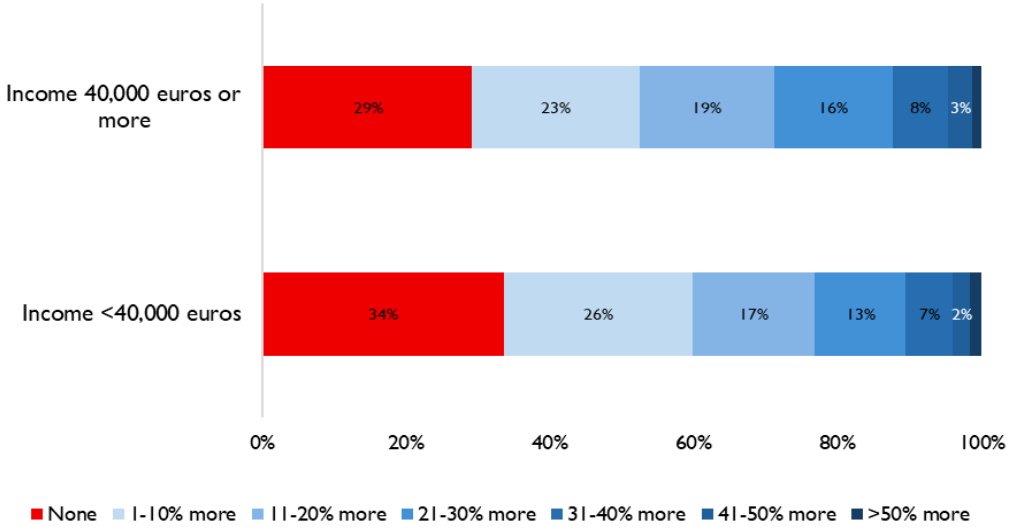


8. Over 70 percent of Europeans would pay a premium for brands and services that personalise, which indicates they derive a welfare gain from personalisation

Online brands that personalise and are fair are awarded with consumers' loyalty and increased business traffic. One common way to measure welfare gains from free digital services is to ask consumers what they would be willing to pay for them. Sixty-six percent of below-average income Europeans would pay a premium for personalised services and 23 percent would pay more than 20 percent (figure 13).

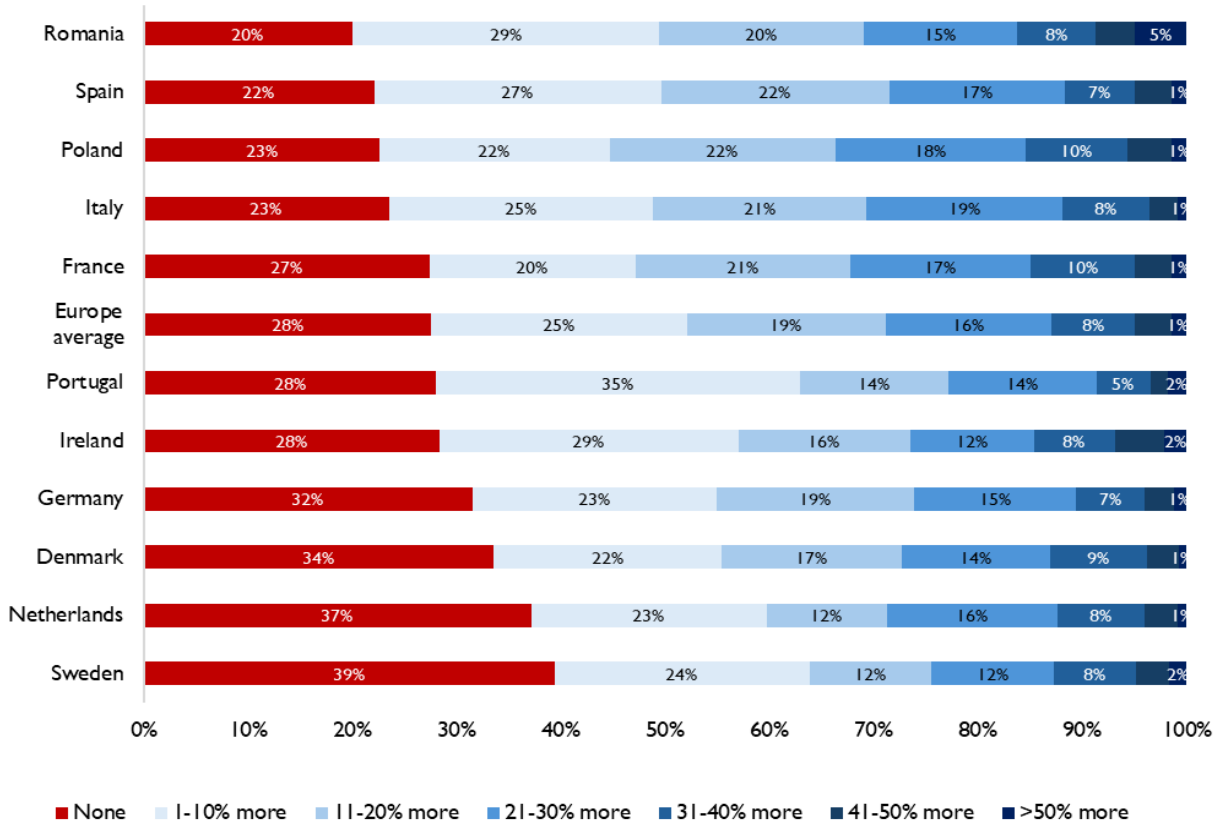
Of above-average consumers, 71 percent would pay a premium for services that personalise their offer and 29 percent would pay more than 20 percent. Many consumers indicated they would spend more on streaming platforms offering tailored recommendations based on their preferred genres, or on e-commerce sites that curate shopping suggestions aligned with their tastes and previous purchases.

Figure 13 - Premium that Europeans would be willing to pay for a brand or service that personalises, by intensity of using the internet



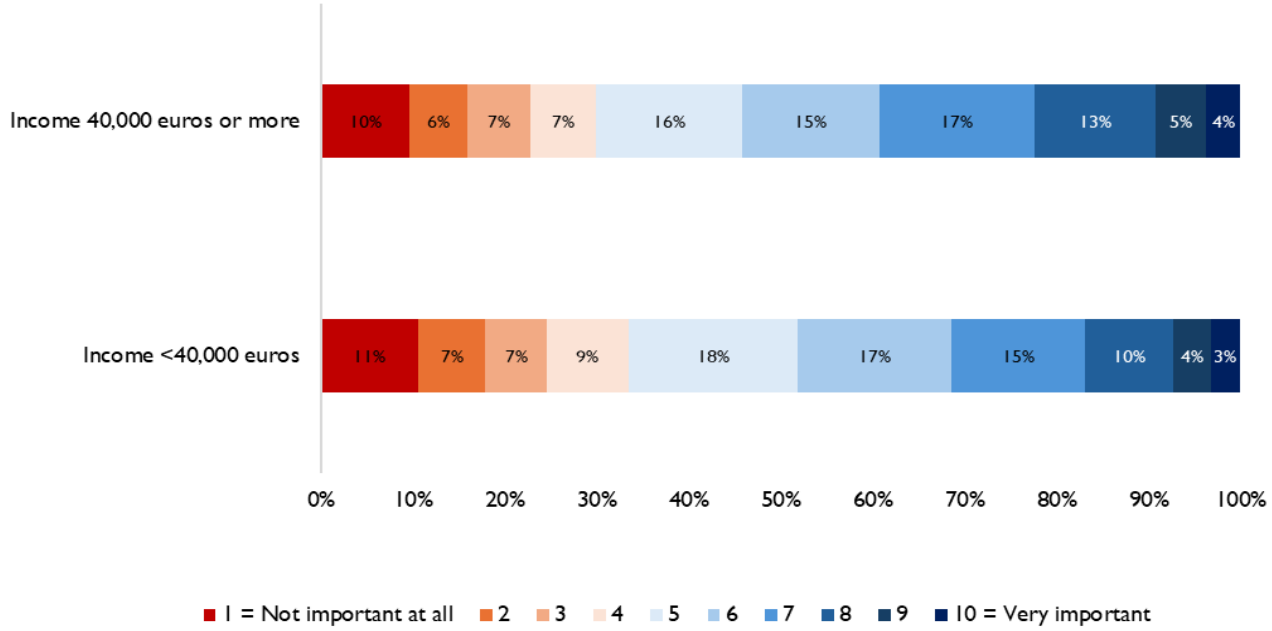
The premium of personalisation is high across Europe among intensive users of the internet, especially in Southern Europe (figure 14).

Figure 14 - Premium that Europeans using internet 4 or more hours per day would be willing to pay for a brand or service that personalises, by country



Overall, on a scale from 1 (personalisation is not important at all) to 10 (personalisation is very important), 54 percent of above-average earners and 48 percent of below-average earners rate it as important – that is, 6 or higher (figure 15).

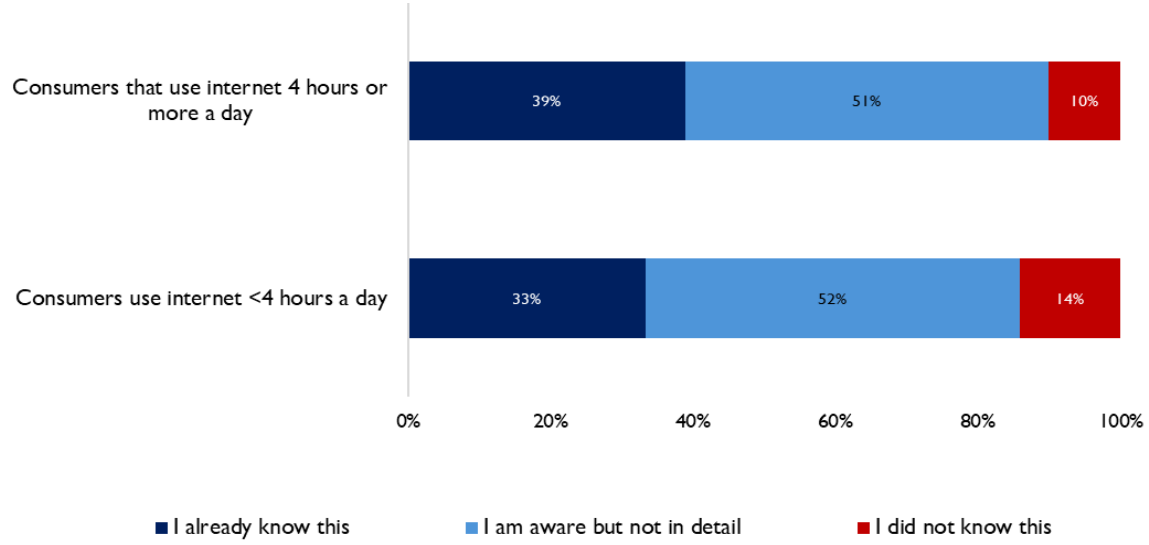
Figure 15 - Value of personalisation for consumers' enjoyment of their digital life, by income group (0=not at all important; 10=very important)



9. A strong majority of consumers understand and accept that personalisation requires some data tracking

Ninety percent of intensive internet users and 86 percent of less intensive ones are aware that their data can be used for personalisation purposes (figure 16). Of the former group, 39 percent understand online services access and process certain data points in order to provide personalised experiences, and another 51 percent report being aware, if not in detail. For consumers that use the internet less than four hours a day, 33 percent are aware their data is used to personalise, and 52 percent are aware though not in detail.

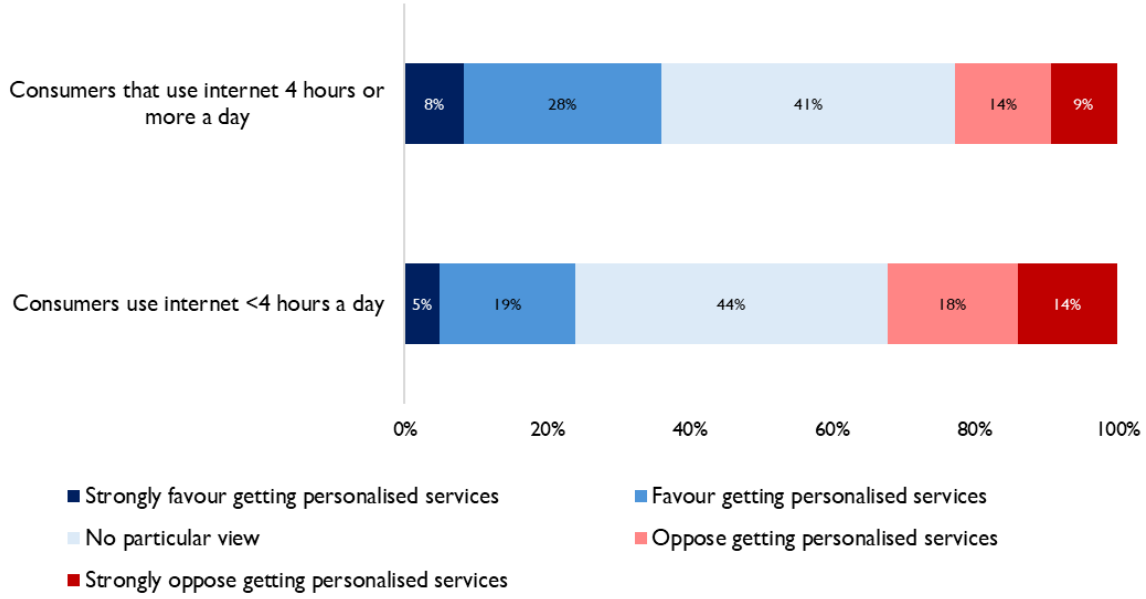
Figure 16 - Share of consumers aware of the notion that getting personalised communications and services implies some form of tracking, by intensity of using the internet



10. Most consumers are fine with, or indifferent to, the trade-off between online services using their data to offer personalised services

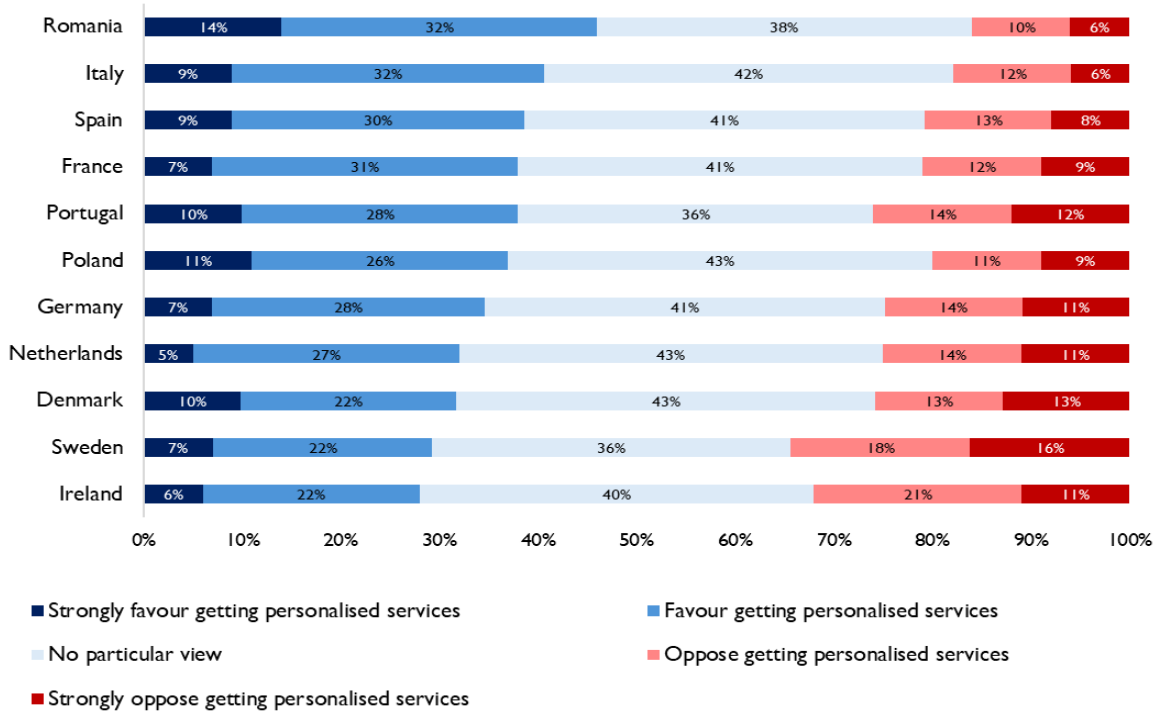
Thirty-six percent of intensive internet users are in favour or strongly in favour of getting personalised services even if it means that online services use their data, while 41 percent are indifferent (figure 17). Only 23 percent oppose or strongly oppose such a trade-off. Out of the less intensive internet users, 32 percent would oppose or strongly oppose personalisation if it means enabling services to access their data, but 44 percent are indifferent and 24 percent would rather get personalised data.

Figure 17 - Share of consumers that want to get personalised services even if it meant various internet services may use their data and track them, by intensity of using the internet



The data is similar across all the surveyed economies, with Southern Europeans again being particularly favourable to personalisation (figure 18).

Figure 18 - Share of consumers that use the internet 4 or more hours per day and want to get personalised services even if services use consumers' data and track them, by country



All in all, the survey reveals a digitally literate and assertive European consumer base – one that encounters dark patterns within some contexts, but actively resists manipulative tactics, punishes brands and services for deceptive actions by turning away from them, and highly values personalisation for reasons such as convenience, relevance, and user experience.

In turn, brands that combine personalisation with transparency and fairness are viewed positively by consumers and best positioned to thrive.

IV. Conclusion

This survey, prepared to inform EU policymakers' work in the upcoming discussions on the Digital Fairness Act, has explored literature on personalisation and dark patterns and reviewed findings from a survey of 10,500 Europeans on their consumer experiences with dark patterns and benefits from personalisation.

The study finds that personalisation, a long-standing practice now enhanced by digital tools, is highly valued by Europeans for offering convenience and saving time. The main findings include:

- Dark patterns are common but not pervasive: most Europeans encounter them (forced sign-ups, manipulative consent, urgency tactics) on a few but not nearly all large e-commerce and travel platforms.

- European consumers act against dark patterns, punishing misbehaving services by refusing to continue buying from deceptive brands (80 percent), and would be prepared to pay a premium for a transparent and fair brand (74 percent).

- Many Europeans are noticing encouraging developments in online transparency and fairness. Easy-to-access unsubscribe buttons were the most frequently observed improvement, reported by 43 percent of intensive internet users and 38 percent of less intensive users. Significant shares of both groups noticed clearer explanations for why email addresses are required (42 percent and 36 percent, respectively), and how their data will be used (39 percent and 41 percent).

- Personalisation is highly valued as saving time and improving user experience online. Some 71 percent of consumers that use the internet intensively find personalised streaming, video, or audio-on-demand services "useful", "very useful" or "extremely useful", and 70 percent find personalised marketplaces useful, very useful, or extremely useful.

- European consumers know about and approve of the trade-off of giving data in exchange of personalisation: 9 in 10 consumers understand personalisation requires data tracking, and most are fine with or indifferent to this exchange.

- In a common way to measure consumers' welfare gains from digital services, the survey finds that over 70 percent of European consumers would even be willing to pay more for personalised services, especially in streaming and marketplaces. This indicates that personalisation enhances Europeans' welfare. In turn, a majority appears to feel that their positive online experiences would be undermined or severely undermined in the absence of personalisation.

Existing EU laws, analysed in depth in another forthcoming report, already address manipulative designs and deceptive practices. This suggests that targeted enforcement against systematic abuses and more guidance should be considered as preferable to introducing new broad regulations that would risk undermining personalisation and decreasing innovation. The Digital

Fairness Act should focus narrowly on genuine regulatory gaps, without eroding the significant consumer benefits of personalisation and ensure enforcement of existing rules.

Appendix 1 – Methodology and sample

This report draws on data from a survey of 10,500 consumers across 12 European Union Member States fielded between 24 June and 10 July 2025 by Nextrade Group using online survey platform Pollfish. The use of an online survey allowed for a broader scope and faster data collection compared to traditional methods, which require creating a sample frame of consumers in a country and then randomly selecting them and conducting computer-assisted telephone interviews (CATI) or face-to-face meetings. Consumers responded to the surveys directly from their devices, such as laptops or computers, which facilitates the survey process and attainment of a representative sample. Quality control practices include questions designed to identify distracted participants and the use of fingerprinting to avoid duplicate responses.

The survey in five countries was below 3 percent margin of error and 95 percent confidence (France, Germany, Ireland, Italy, and Poland) and below 6 percent margin of error for five countries (Denmark, Netherlands, Portugal, Romania, Sweden) (figure 1-1). Most respondents use the internet at least four hours per day (figure 1-2). Some 55 percent are working professionals (figure 1-3). However, the survey also includes manual workers (21 percent), retirees (9 percent), and students (8 percent). Fifty-seven percent earn less than €40,000 per year (figure 1-4).

Figure 1-1 - Respondents by country and gender

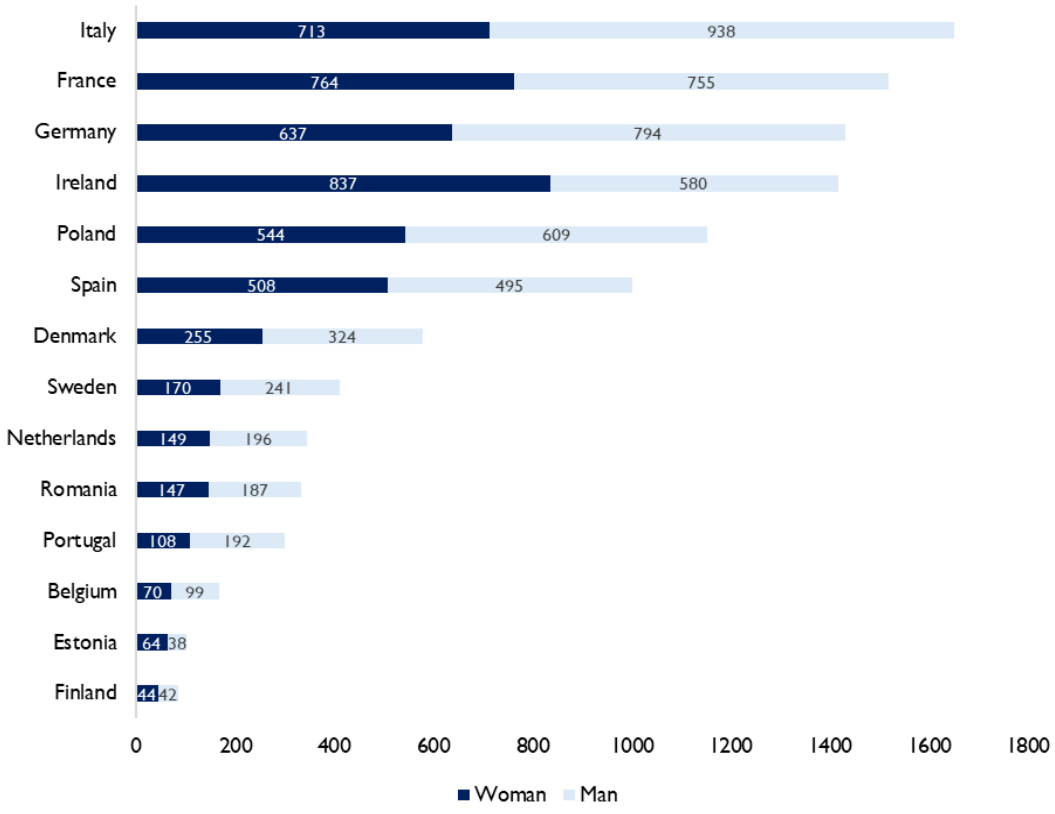


Figure 1-2 - Respondents by intensity of using the internet (hours per day), by country

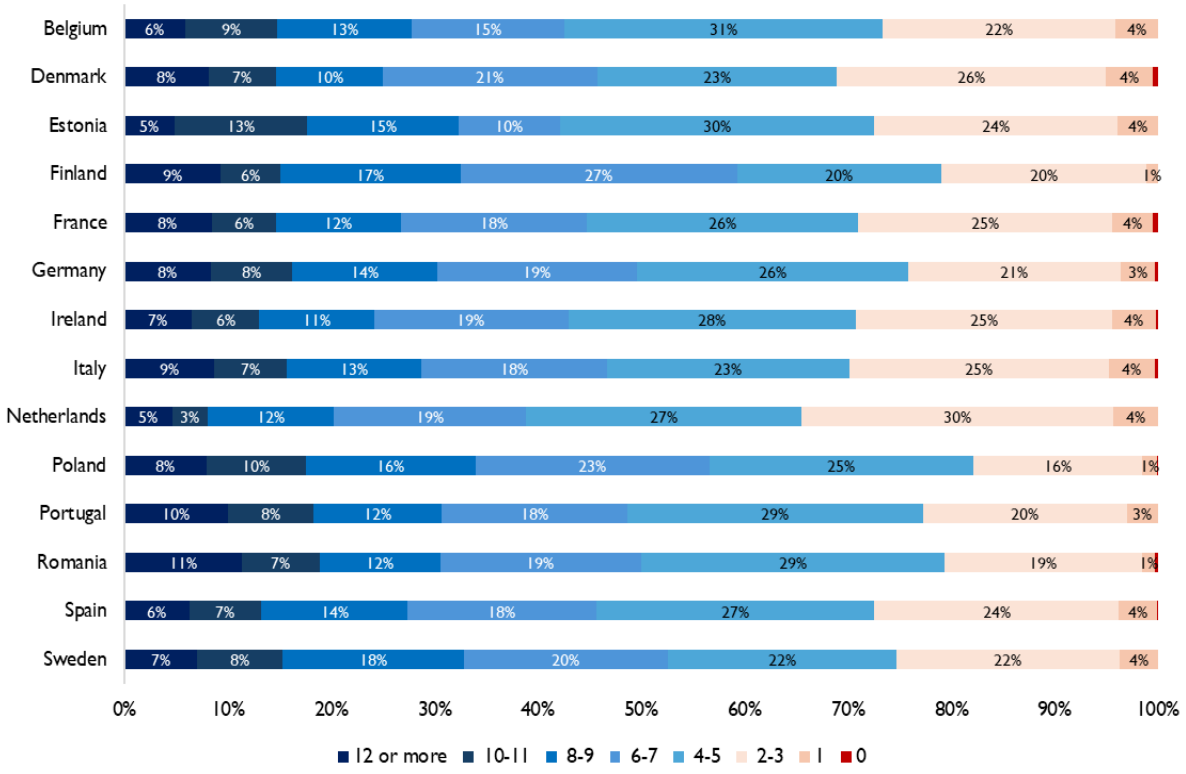


Figure 1-3 - Respondents by occupation

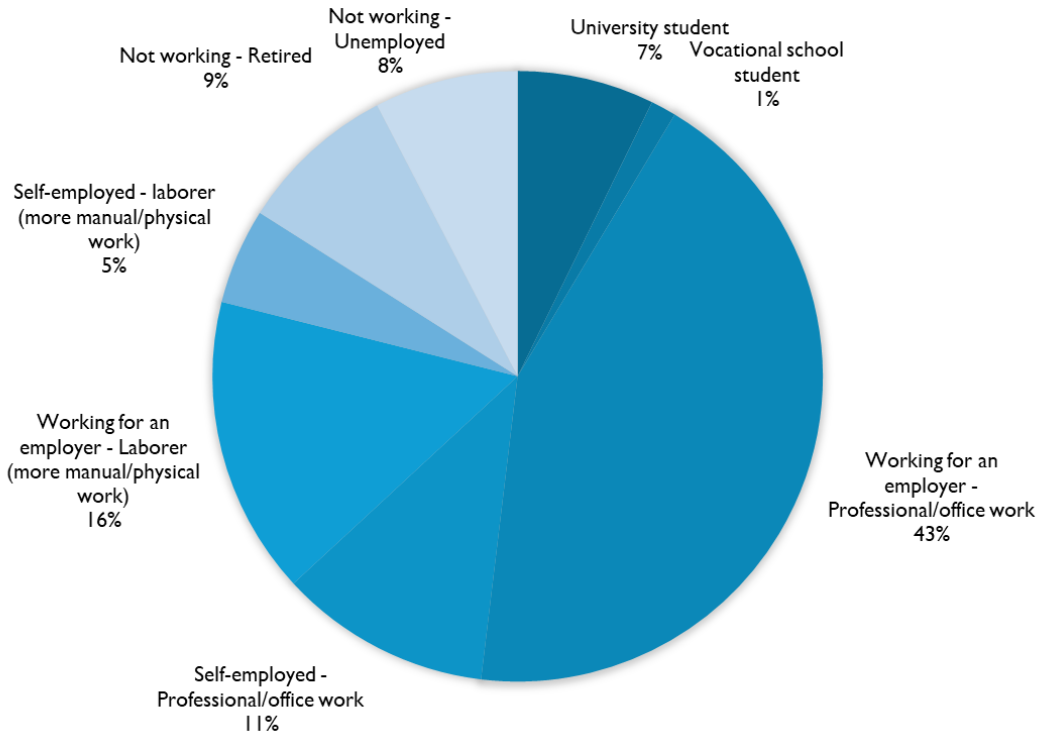
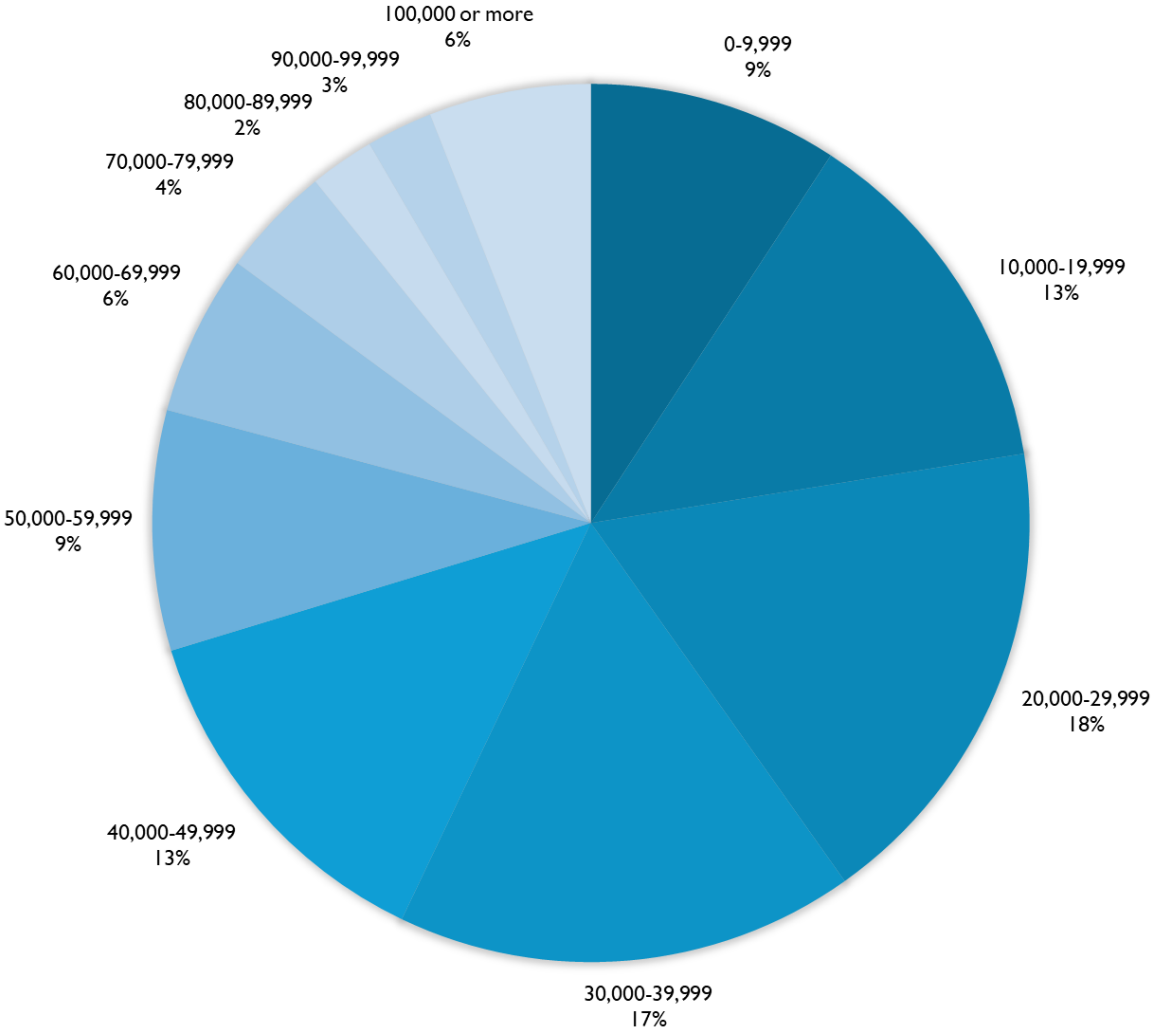


Figure 1-4 - Respondents by income (in euro)



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