A&L Goodbody

EU, COMPETITION & PROCUREMENT

Regulation of Digital Markets

Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (**Digital Markets Act (DMA)**).

The DMA is a legislative initiative designed by the European Commission (**Commission**) to encourage greater contestability and fairness in the digital economy. The DMA is now in force and the majority of its provisions will apply from 2 May 2023.

12 MIN READ

The DMA introduces a system of *ex ante* regulation for providers of certain digital services who have significant influence on the EU's internal market and who provide an important gateway for business users to reach end-users. The legislation provides for a system which will enable such providers to be designated by the Commission as "gatekeepers" in respect of one or more of their services. Once designated, they will have 6 months to comply with a set of obligations which are aimed primarily at reducing barriers to entry and expansion for other digital service providers and ensuring that they have access to the same key inputs as gatekeepers.

The Commission is accorded significant powers of investigation and enforcement under the DMA. These include the ability to (i) conduct on-site inspections, (ii) initiate market investigations, (iii) impose interim measures and (iv) order legally binding commitments. Fines of up to 10% of worldwide turnover can be imposed on gatekeepers who act in breach of certain obligations under the DMA. These can be increased to 20% where the gatekeeper has committed the same or a similar infringement in respect of the same service in the previous 8 years.

Where a market investigation determines that there has been systematic non-compliance (which is presumed where at least 3 non-compliance decisions have been issued against the gatekeeper in the preceding 8 years), the Commission is empowered to impose a range of possible structural or behavioural remedies. These can include prohibiting gatekeepers from entering into certain acquisitions relevant to the infringement for a prescribed period.

The DMA will significantly increase the regulatory obligations of large digital platforms, while presenting enhanced opportunities for smaller platforms and for business users who depend on gatekeepers to offer their services.

The following Q&A provides further details on the core aspects of the DMA.

Q&A

Scope

What is the scope of the DMA?

The DMA applies to "core platform services" provided or offered by certain businesses designated as "gatekeepers" to:

i. business users (i.e. individuals or entities acting in a commercial or professional capacity who use such services for the purpose of or in the course of providing goods or services to end users) established in the EU or

ii. end users (i.e. individuals or entities using such services other than as business users) established or located in the EU.

The DMA applies irrespective of the place of establishment or residence of the gatekeeper and of the law otherwise applicable to the provision of the service. Markets related to electronic communications networks and services (other than those related to number-independent interpersonal communications services (e.g. WhatsApp)) fall outside the scope of the DMA.

What are core platform services?

Under the DMA, "core platform services" are understood to mean:

a. online intermediation services (e.g. Amazon)
b. online search engines (e.g. Google search)
c. online social networking services (e.g. Facebook)
d. video-sharing platform services (e.g. YouTube)
e. number-independent interpersonal communications services (e.g. WhatsApp)
f. operating systems (e.g. Windows)
g. web browsers (e.g. Chrome)
h. virtual assistants (e.g. Siri)
i. cloud computing services (e.g. AWS) or
j. online advertising services, including any advertising networks, advertising exchanges and any other advertising intermediation services provided by a business that provides any of the services listed in points (a) to (i).

The Commission may conduct a market investigation (including at the request of 3 or more Member States) to examine whether further services within the digital sector should be added to the current list. The DMA also provides for a review of the legislation, which must include an evaluation of whether the current list of core platform services requires modification, by 3 May 2026 and subsequently every 3 years.

Designation as a Gatekeeper

When will a business be designated as a gatekeeper?

The DMA requires a business to be designated as a gatekeeper where it meets the following 3 qualitative criteria, which are deemed to be satisfied where specific quantitative thresholds are reached:

a. the gatekeeper has a **significant impact on the internal market** - this criterion will be deemed to be met where it achieved an annual EU turnover of at least €7.5b in each of the last 3 financial years, or where its average market capitalisation or its equivalent fair market value amounted to at least €75b in the last financial year, and it provides the same core platform service in at least 3 Member States
b. it provides a **core platform service which is an important gateway for business users to reach end users** – this criterion will be satisfied where it provides a core platform service that in the last financial year had at least 45 million monthly active end users established or located in the EU and at least 10,000 yearly active business users established in the EU (as calculated in the manner set out in the Annex to the DMA), and
c. it enjoys an **entrenched and durable position** in its operations, **or it is foreseeable that it will enjoy such a position in the near future** – this will be considered to be the case where the thresholds set out at point (b) above were met in each of the last 3 financial years.

Businesses must notify the Commission within 2 months of meeting these thresholds (or, where the business has already been designated as a gatekeeper, within 2 months of another of its core platform services meeting the thresholds) and provide it with the necessary underlying evidence. Where they fail to do so, they may still be designated as gatekeepers by the Commission based on the evidence available to it.

The DMA prohibits the division of services through contractual, commercial, technical or any other means in order to circumvent the quantitative thresholds. The Commission must designate a provider of core platform services that meets the relevant thresholds as a gatekeeper within 45 working days of receipt of a full set of information.

Can a business that meets the relevant quantitative thresholds seek to resist designation as a gatekeeper?

Yes, although there is a high standard for resisting designation.

A business providing core platform services may present sufficiently substantiated arguments with its notification to demonstrate that, exceptionally, it does not meet the qualitative characteristics of a gatekeeper, notwithstanding the fact that it satisfies all of the relevant quantitative thresholds. Within 45 working days of receipt of a full set of information, the Commission may reject these arguments if they are insufficiently substantiated. Alternatively, where it considers that sufficiently substantiated arguments are presented which manifestly call into question the presumptions laid down in Article 3(2) of the DMA, it may choose to open a market investigation.

The Commission must endeavour to conclude its market investigation within 5 months of the date of opening of the investigation. If the Commission concludes that the business providing core platform services is unable to demonstrate that its services do not satisfy the qualitative requirements of a gatekeeper, it must designate that business as a gatekeeper.

Can a business providing a core platform service that does not meet the relevant quantitative thresholds be designated as a gatekeeper?

Yes, following a market investigation (including one requested by 3 or more Member States), the Commission must designate as a gatekeeper a core platform service provider that is found to meet the qualitative characteristics of a gatekeeper, even where it does not satisfy each of the relevant quantitative thresholds. The Commission must endeavour to reach a decision within 12 months of the date of opening of the market investigation.

For this purpose, the Commission is required to take into account some or all of the following elements, insofar as they are relevant to the core platform service provider in question:

a. its size, including turnover and market capitalisation, operations and position
b. the number of business users using the core platform service to reach end users and the number of end users
c. network effects and data driven advantages, in particular in relation to its access to, and collection of, personal data and non-personal data or analytics capabilities
d. any scale and scope effects from which it benefits, including with regard to data, and, where relevant, to its activities outside the EU
e. business user or end user lock-in, including switching costs and behavioural bias reducing the ability of business users and end users to switch or multi-home
f. a conglomerate corporate structure or vertical integration which, for instance, enable it to cross subsidise, to combine data from different sources or to leverage its position or
g. other structural business or service characteristics.

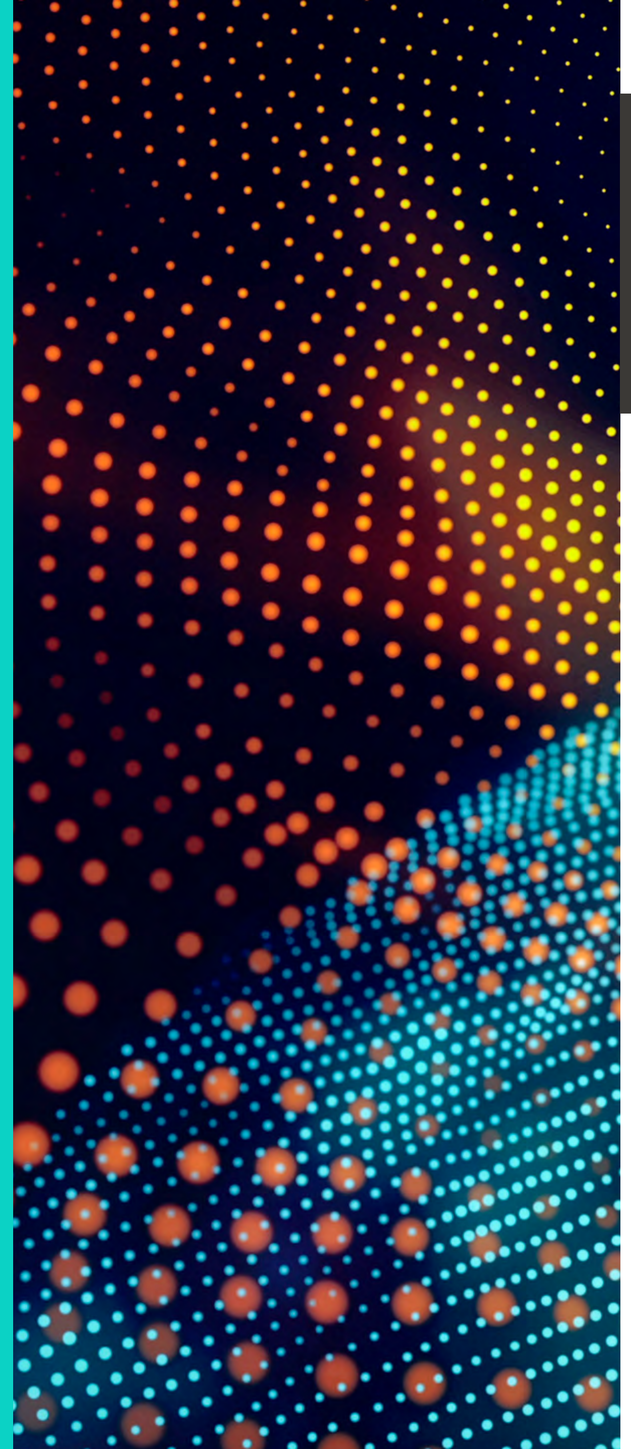
The Commission is also obliged to take into account foreseeable developments in relation to the above elements, including any planned concentrations (as defined by the EU Merger Regulation (**EUMR**) and including acquisitions and certain joint ventures) involving another business providing core platform services or any other services in the digital sector or enabling the collection of data.

Where there is a significant failure by any such business to comply with investigative measures ordered by the Commission, which persists after it has been invited to comply within a reasonable time limit and to submit observations, the Commission may designate the business as a gatekeeper based on the facts available to it.

Is it possible for a designation decision to be amended?

Yes, the Commission may amend or repeal a designation decision, either on its own initiative or upon request where: (a) there has been a substantial change in any of the facts on which the designation decision was based or (b) the decision was based on incomplete, incorrect or misleading information.

There is an obligation on the Commission under the DMA to review whether gatekeepers continue to satisfy the required qualitative characteristics and whether the list of designated core platform services needs to be amended at least every 3 years. The Commission is also required to examine whether new businesses providing core platform services satisfy those requirements at least annually. A list of gatekeepers and designated core platform services must be published and updated by the Commission on an ongoing basis.



Obligations imposed on Gatekeepers under the DMA

Are obligations/prohibitions imposed on gatekeepers under the DMA?

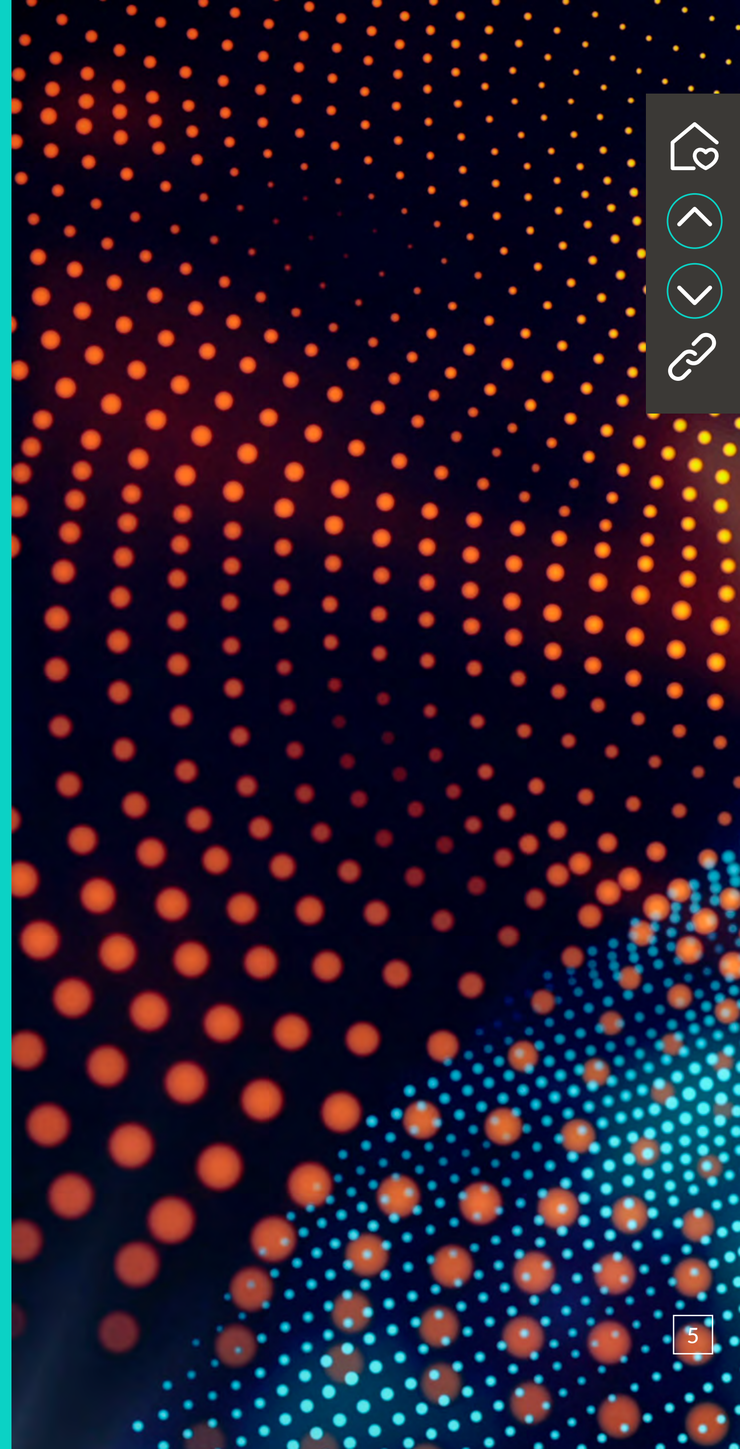
Yes, Articles 5 - 7 of the DMA impose specific obligations on gatekeepers in respect of the core platform services laid down in their designation decisions.

A gatekeeper must comply with these obligations within 6 months of the listing of a core platform service in a designation decision and must provide the Commission with a report describing the measures it has implemented to ensure compliance with its obligations. Delegated acts may be adopted by the Commission to supplement certain of these obligations. A market investigation may also be conducted (including at the request of 3 or more Member States) to examine whether any practices should be added to, or removed from, Articles 5 – 7 of the DMA.

Which types of positive obligations are imposed on gatekeepers under the DMA?

Examples of positive obligations under Articles 5 – 7 of the DMA include the following requirements:

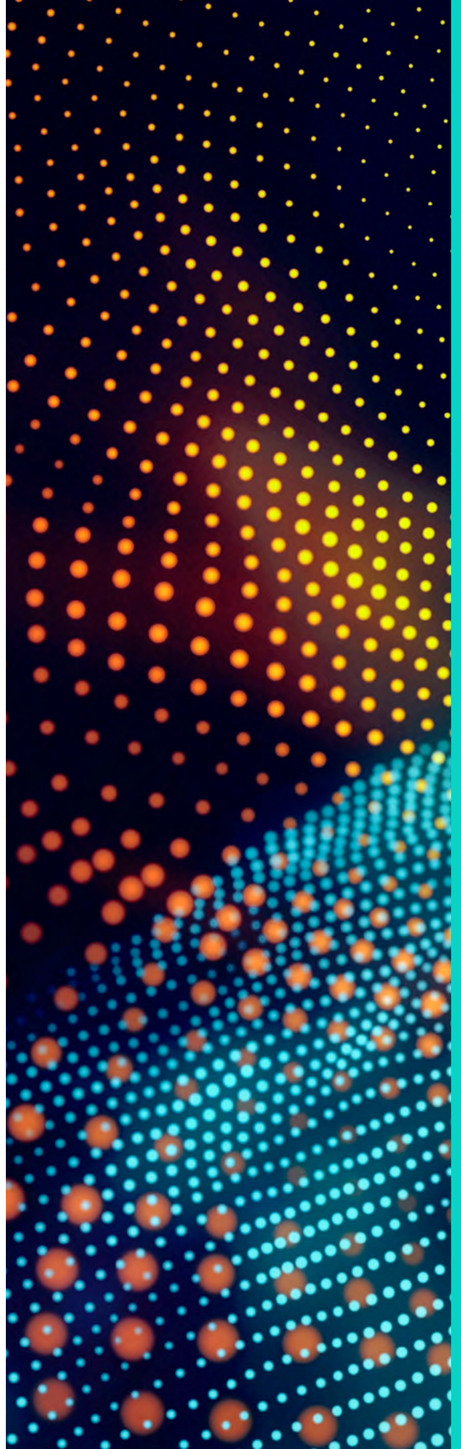
- **Ability to easily change default settings:** Gatekeepers must allow end users to easily change default settings on the gatekeeper's operating system, virtual assistant and web browser that direct or steer end users to products or services provided by the gatekeeper
- **Ability to easily un-install software applications:** Gatekeepers must allow and technically enable end users to easily un-install any software applications on the operating system of the gatekeeper
- **Ability to install and effectively use third-party software applications or application stores:** Gatekeepers must allow and technically enable the installation and effective use of third-party software applications or software application stores using, or interoperating with, the gatekeeper's operating system and allow those applications or stores to be accessed by means other than the relevant core platform services of the gatekeeper
- **Effective interoperability:** Gatekeepers must allow providers of services and of hardware, free of charge, effective interoperability with the same hardware and software features accessed or controlled via the operating system or virtual assistant listed in the designation decision as are available to services or hardware provided by the gatekeeper. Effective interoperability must also be provided free of charge to business users and alternative providers of services provided together with, or in support of, core platform services
- **Effective portability of data:** Gatekeepers must provide end users (and authorised third parties), at their request and free of charge, with effective portability of data provided by the end user or generated through the activity of the end user in the context of the use of the relevant core platform service. A similar requirement exists to provide business users (and authorised third parties), at their request and free of charge, with access to, and use of, aggregated and non-aggregated data, including personal data that is provided for or generated in the context of the use of the relevant core platform services or related services by those business users and the end users engaging with their products or services



- **Access on fair, reasonable and non-discriminatory terms to ranking, query, click and view data:** Gatekeepers must provide any third party providing online search engines, at its request, with access on fair, reasonable and non-discriminatory terms to ranking, query, click and view data in relation to free and paid searches generated by end users on its online search engines
- **Fair, reasonable and non-discriminatory general conditions of access:** Gatekeepers must apply fair, reasonable and non-discriminatory general conditions of access for business users to its designated software application stores, online search engines and online social networking services
- **Provision of enhanced data to advertisers and publishers:** Gatekeepers must provide enhanced data to advertisers and publishers who use gatekeepers for online advertising purposes, including information on fees/remuneration and performance data collected by gatekeepers and
- **Interoperability of designated number-independent interpersonal communications services:** Gatekeepers must, where applicable (i.e. where they provide designated number-independent interpersonal communications services), make the basic functionalities of such services interoperable with the number-independent interpersonal communications services of other providers offering or intending to offer such services in the EU.

Further requirements imposed on gatekeepers include the following obligations:

- **Obligation to inform the Commission of certain intended concentrations:** Gatekeepers must inform the Commission of any intended concentration within the meaning of the EUMR prior to its implementation, where the merging entities or the target of concentration provide core platform services or any other services in the digital sector or enable the collection of data. This obligation applies even where the concentration is not notifiable to the Commission or to a national competition authority **(NCA)** such as the Irish Competition and Consumer Protection Commission under merger control rules. The Commission must inform the NCAs of any such information it receives (as well as publishing an annual list of acquisitions) and the NCAs may, in turn, request the Commission to examine any of the concentrations concerned pursuant to Article 22 EUMR (Article 14(1) and (4)-(5) of the DMA)



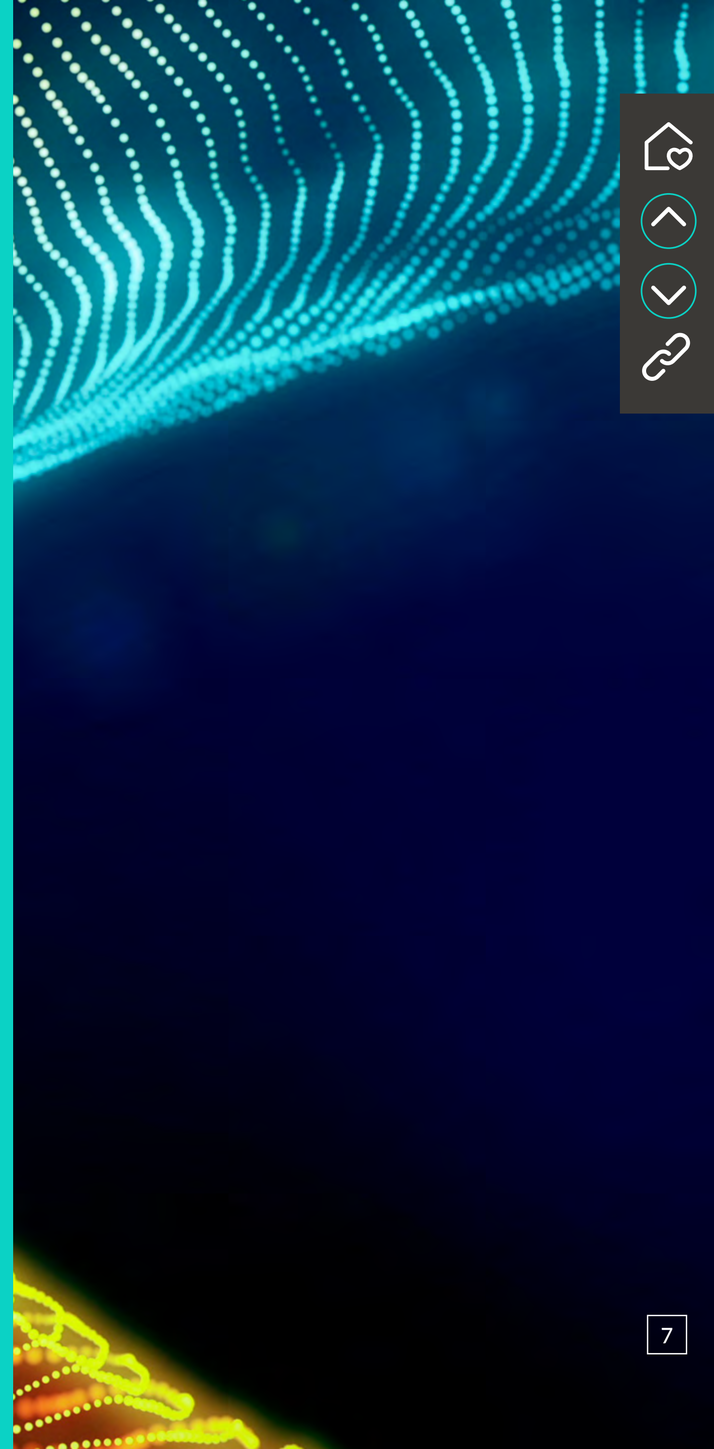
- **Obligation to inform the Commission of the implementation of certain concentrations:** Gatekeepers must inform the Commission within 2 months of the implementation of a concentration, following which additional core platform services individually meet prescribed end user and business user thresholds (Article 14(3) of the DMA)
- **Submission of an audited description of consumer profiling techniques:** Gatekeepers must submit to the Commission an independently audited description of any techniques for the profiling of consumers that it applies to or across its designated core platform services (Article 15 of the DMA) and,
- **Establishment of compliance function:** Gatekeepers must establish a compliance function which is independent from the gatekeeper's operational functions in order to organize and monitor compliance with the DMA (Article 28 of the DMA).

Which types of prohibitions are imposed on gatekeepers under the DMA?

Examples of prohibitions imposed on gatekeepers under Articles 5 and 6 of the DMA include a requirement not to:

- **prevent business users from offering the same products or services to end users through third-party online intermediation services or through their own direct online sales channel at prices or conditions that are different** from those offered through the online intermediation services of the gatekeeper
- **treat the services and products offered by the gatekeeper itself more favourably than similar services or products of a third party** with respect to ranking and related indexing and crawling
- **require end users to use (or business users to use), to offer or to interoperate with a gatekeeper's identification service, web browser engine, payment service or technical services that support the provision of payment services, such as payment systems for in-app purchases**, in the context of services provided by the business users using that gatekeeper's core platform services
- **require business users or end users to subscribe to, or register with, any further core platform services listed in the designation decision or which meet prescribed thresholds** (i.e. which in the last financial year had at least 45 million monthly active end users established or located in the EU and at least 10,000 yearly active business users established in the EU) as a condition for being able to use, access, sign up for or register with any of that gatekeeper's designated core platform services
- unless the end user has been presented with the specific choice and has given consent, **combine personal data from the relevant core platform service with personal data from any further core platform services or any other services provided by the gatekeeper or with personal data from third-party services**
- unless the end user has been presented with the specific choice and has given consent, **cross-use personal data from the relevant core platform service in other services provided separately by the gatekeeper, including other core platform services and vice versa or sign in end users to other services of the gatekeeper in order to combine personal data**
- **restrict technically or otherwise, the ability of end users to switch between, and subscribe to, different software applications and services that are accessed using the core platform services of the gatekeeper**, including as regards the choice of Internet access services for end users and
- have **general conditions for terminating the provision of a core platform service that are disproportionate.**

In addition, the DMA prohibits gatekeepers from engaging in any behavior (including of a contractual, commercial or technical nature, or which consists in the use of behavioural techniques or interface design) that undermines effective compliance with the obligations in Articles 5 – 7 of the DMA. To this end, gatekeepers are prohibited from degrading the conditions or quality of any of the core platform services provided to business users or end users who avail themselves of the rights or choices laid down in Articles 5 – 7 of the DMA or making the exercise of those rights or choices unduly difficult. Where consent for the collecting, processing, cross-using and sharing of personal data is required by a business user to ensure compliance with the DMA, gatekeepers are also prohibited from making the obtaining of that consent by the business user more burdensome than for its own services.



Can the Commission investigate compliance by a gatekeeper with its obligations under the DMA?

Yes, the Commission may open proceedings on its own initiative or at the request of a gatekeeper. Within 6 months of the opening of such proceedings, it may adopt an implementing act, specifying the measures that the gatekeeper concerned must implement in order to effectively comply with the obligations laid down in Articles 6 and 7 of the DMA. A gatekeeper may also request the Commission to engage in a process to determine whether the measures that it intends to implement or has implemented to ensure compliance with Articles 6 and 7 of the DMA are effective in achieving the objective of the relevant obligation(s). The Commission can engage with such a process or otherwise. Where the gatekeeper circumvents or attempts to circumvent any of the obligations in Article 5 - 7 in the manner described in the DMA, the Commission may also open proceedings and adopt an implementing act specifying the measures that the gatekeeper is to implement.

Is it possible for the obligations laid down in respect of a core platform service in the designation decision to be suspended?

Yes, if the gatekeeper demonstrates in a reasoned request that compliance with a specific obligation listed in the designation decision would, due to exceptional circumstances beyond its control, endanger the economic viability of its operation in the EU.

In such cases, the Commission may adopt an implementing act exceptionally suspending the specific obligation referred to in that request, either wholly or partly. It must aim to do so within 3 months of receipt of a complete request.

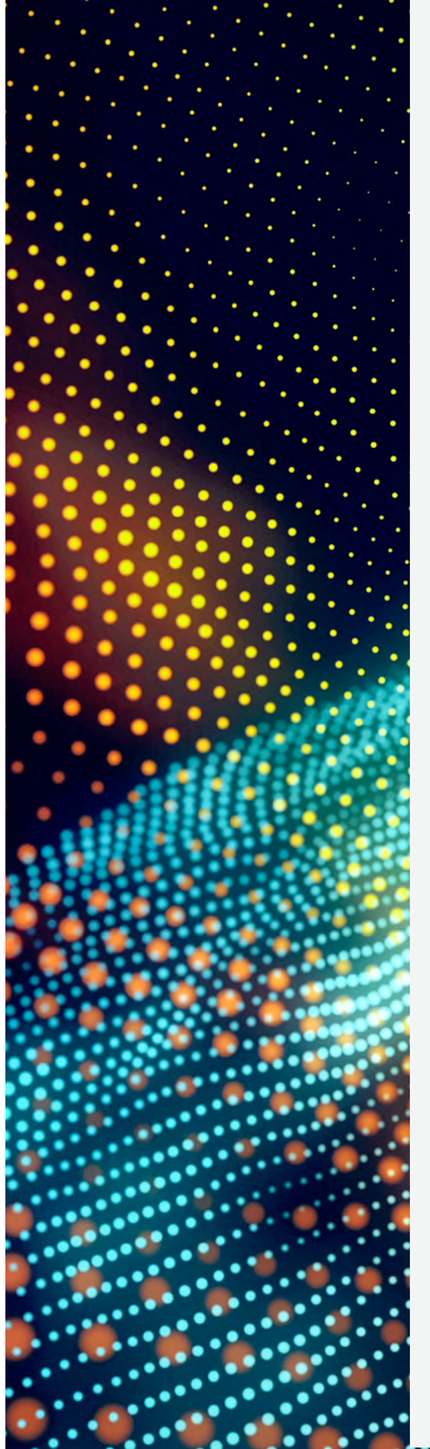
Any such suspension decision must take into account the impact of the obligation on the economic viability of the operation of the gatekeeper in the EU, as well as on third parties, in particular SMEs and consumers. It may be made subject to specific conditions and must be reviewed at least annually (or within such shorter period as is laid down in the decision). In cases of urgency, an obligation may be provisionally suspended before the Commission has taken a final decision.

Full or partial exemption from an obligation laid down in a designation decision is also possible where the Commission, at the request of a gatekeeper or on its own initiative, adopts an implementing act in which it decides that this is justified on the grounds of public health or security. The decision (which may be made subject to conditions) must take into account, in particular, the impact of the obligation on public health and security, as well as the effects on the gatekeeper and on third parties. A decision must be taken within 3 months of receipt of a complete request, although in urgent cases, a provisional suspension can be applied pending the final decision. An exemption decision must be reviewed if the ground for the exemption no longer exists or at least annually.

Powers of Investigation and Enforcement

What investigative powers does the Commission have to carry out its duties under the DMA?

The powers available to the Commission to carry out its duties under the DMA



include the right to carry out unannounced on-site inspections of a business or association of businesses.

In order to do so, the Commission can request the assistance of auditors or experts or the NCA of the Member State concerned. During an inspection, the officials and other accompanying persons authorised by the Commission may enter any premises, land and means of transport of the business or association, examine and take copies or extracts of any books and records related to the business and seal any business premises, books or records. They may also ask for explanations of facts or documents relating to the subject-matter and purpose of the inspection or require the business/association to provide access to and explanations of its organisation, functioning, IT system, algorithms, data-handling and business practices and record the explanations given by any technical means. Inspections must be submitted to by businesses when ordered by way of Commission decision.

Further powers available to the Commission include the right to interview any natural or legal person who consents to being interviewed for the purpose of collecting information relating to the subject-matter of an investigation.

The Commission may also request all necessary information (including data, algorithms and information about testing) from businesses or associations by way of simple request or decision.

Can interim measures be imposed by the Commission under the DMA?

Yes, where there is urgency due to the risk of serious and irreparable damage for business users or end users of gatekeepers, the Commission may adopt an implementing act ordering interim measures against a gatekeeper on the basis of a prima facie finding of an infringement of Article 5, 6 or 7 of the DMA. This is possible only in the context of proceedings opened with a view to the possible adoption of a non-compliance decision. The interim measures can apply only for a specified period of time but may be renewed in so far this is necessary and appropriate.

What financial penalties are available to the Commission under the DMA?

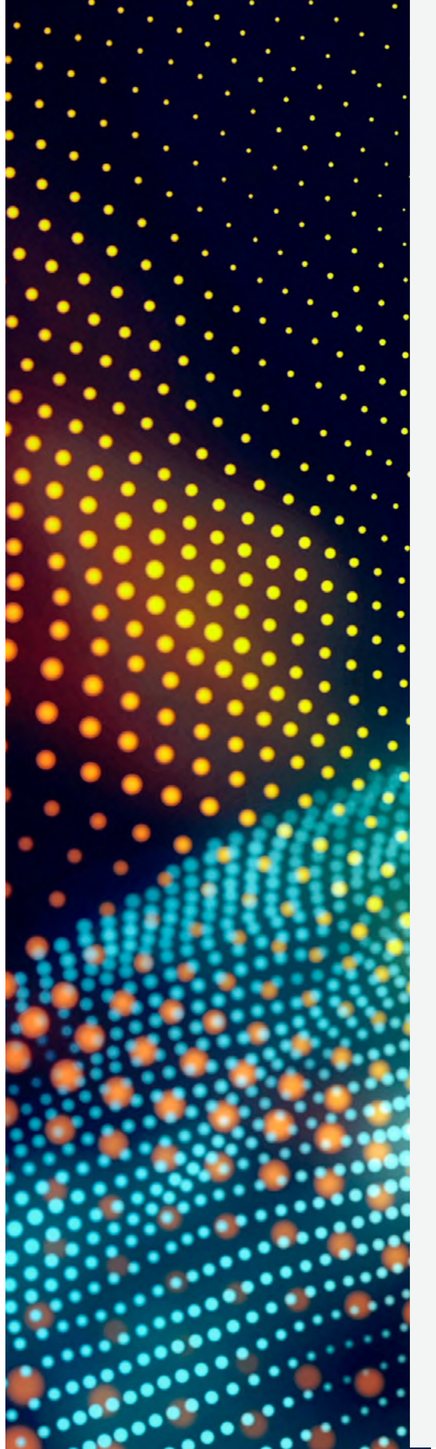
The Commission may impose penalties of up to 10% of total worldwide turnover in the preceding financial year on gatekeepers who are found in a non-compliance decision to have intentionally or negligently failed to comply with certain obligations. These include the obligations imposed on a gatekeeper under Articles 5 – 7 of the DMA (and any other obligations laid down by the Commission in an implementing act to ensure compliance by a gatekeeper with Articles 6 or 7 of the DMA), as well as certain remedies, interim measures and legally binding commitments under the DMA.

Fines can be increased to up to 20% of a gatekeeper's worldwide turnover in the preceding financial year where it committed the same or a similar infringement of its obligations under Articles 5 – 7 of the DMA in relation to the same core platform service during the preceding 8 years.

Lesser fines of up to 1% of the worldwide turnover of a business/association in the previous financial year may be applied for certain other intentional or negligent failures under the DMA. These include a failure to notify the Commission where the thresholds for designation as a gatekeeper are met or to notify information relating to certain proposed concentrations.

Periodic penalty payments of up to 5% of the average daily worldwide turnover in the preceding financial year per day can also be imposed in order to compel compliance with certain obligations, including the requirement to submit to an inspection or comply with a request for information.

A decision by the Commission to impose



a fine or periodic penalty payment can be reviewed by the Court of Justice, which can cancel, increase or reduce the fine or payment concerned.

What actions can the Commission take in relation to systematic non-compliance under the DMA?

The Commission can conduct a market investigation to examine whether a gatekeeper has engaged in systematic non-compliance. One or more Member States may request the Commission to open such an investigation. The Commission must conclude its investigation within 12 months (subject to extension(s) of up to 6 months). Systematic non-compliance is presumed as regards to the obligations imposed on a gatekeeper under Articles 5 – 7 of the DMA where the Commission has issued at least 3 non-compliance decisions against it in relation to any of its core platform services in the preceding 8 years.

Where a gatekeeper has systematically infringed any of its obligations under Articles 5 - 7 of the DMA and has maintained, strengthened or extended its qualitative characteristics as a gatekeeper, the Commission can impose any behavioural or structural remedies on it which are proportionate and necessary to ensure effective compliance with the DMA. These remedies can include prohibiting the gatekeeper for a limited period from entering into a concentration regarding the core platform services or the other services provided in the digital sector or enabling the collection of data that are affected by the systematic non-compliance.

During a market investigation, the gatekeeper can also offer commitments relating to the relevant core platform services to ensure compliance with Articles 5 – 7 of the DMA. In such cases, the Commission may adopt an implementing act making those commitments binding and declare that there are no further grounds for action.

How does the DMA interact with the powers of Member States, national courts and NCAs?

The Commission has primary responsibility for the application and enforcement of the DMA. The DMA prohibits Member States from imposing further obligations on gatekeepers for the purpose of ensuring contestable and fair markets. It also prevents NCAs and national courts from taking decisions which are contrary to those adopted by the Commission under the DMA. In addition, national courts must avoid giving decisions which would conflict with a decision contemplated by the Commission in proceedings it has initiated under the DMA (which may require them to assess whether it is necessary to stay proceedings).

The DMA does, however, allow Member States to impose obligations on businesses (including core platform service providers) for matters falling outside the scope of the DMA, provided that they are compatible with EU law and do not result from the fact that the relevant businesses have been designated as gatekeepers. The DMA is also stated to be without prejudice to the application of Articles 101 and 102 TFEU (the EU rules prohibiting anti-competitive arrangements and abuses of dominance), as well as to:

a. national competition rules prohibiting anti-competitive agreements, decisions by associations of businesses, concerted practices and abuses of dominant positions
b. national competition rules prohibiting other forms of unilateral conduct insofar as they are applied to businesses other than gatekeepers or amount to the imposition of further obligations on gatekeepers and
c. the EUMR and national rules concerning merger control.

The DMA permits an NCA (where it has the competence and investigative powers to do so under national law) to conduct an investigation on its own initiative into possible non-compliance with Articles 5 - 7 of the DMA on its territory. Where the Commission has opened proceedings pursuant to Article 20, an NCA is, however, prevented from conducting such an investigation or, where it is already ongoing, from ending it.

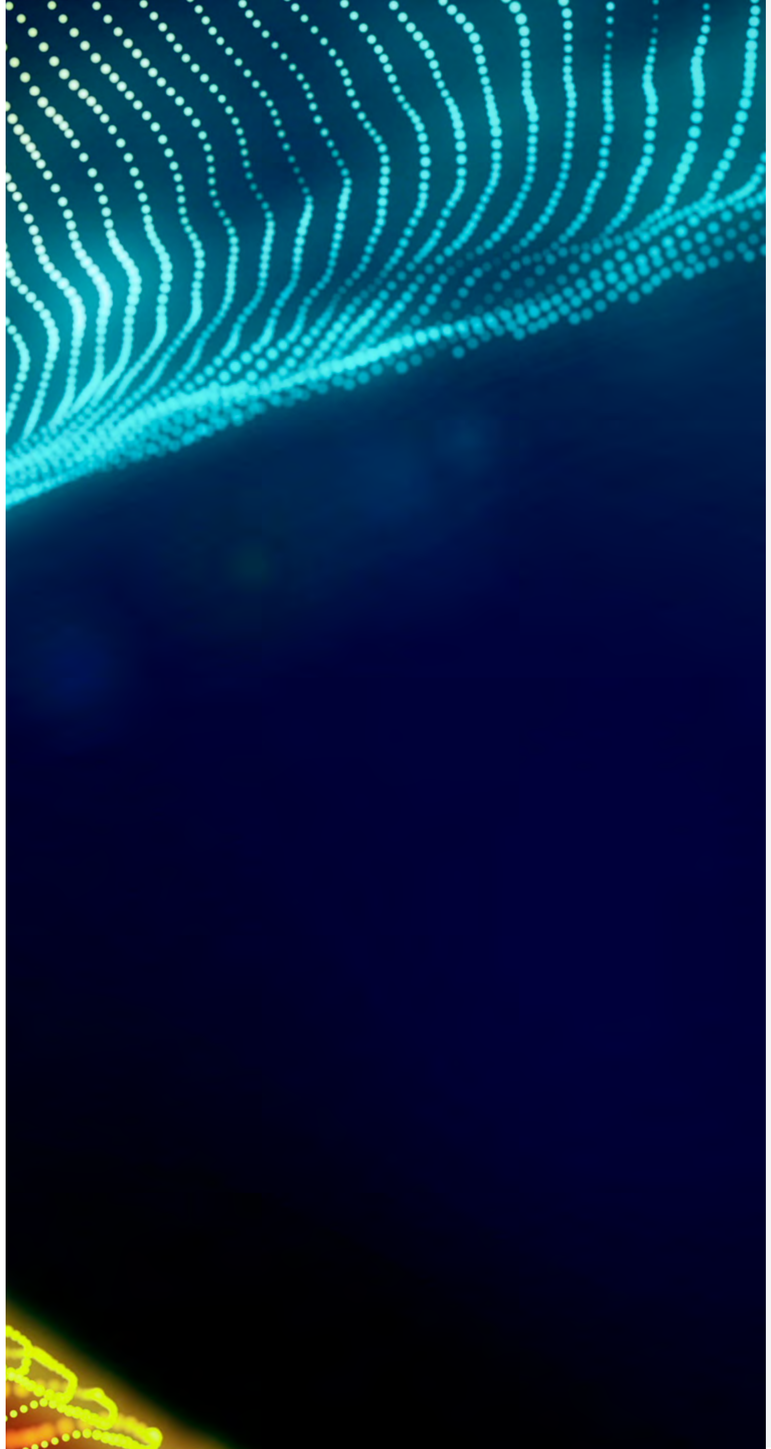
From when will the DMA apply and what are the key dates under the DMA?

The key dates are as follows:

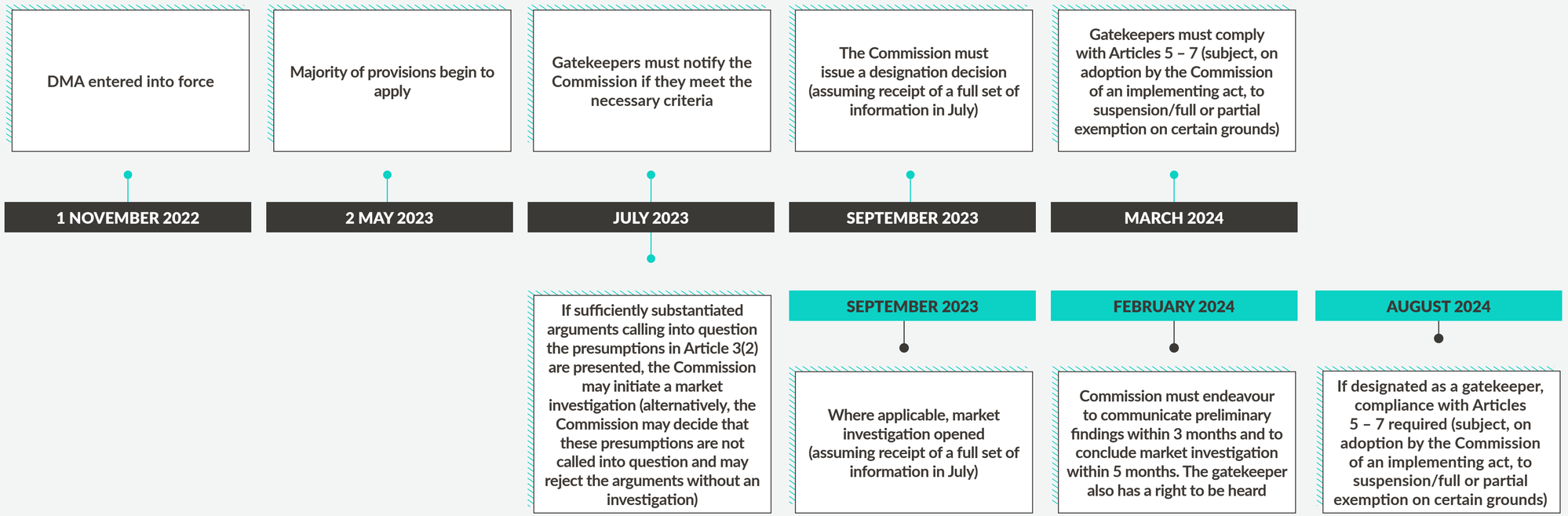
- The DMA entered into force on 1 November 2022 and will apply, subject to certain exceptions, from 2 May 2023
- Gatekeepers will have 2 months (i.e. until July 2023) to notify the Commission that they meet the relevant criteria
- The Commission will have 45 working days following receipt of a full set of information to assess the notification
- Once designated, gatekeepers will have 6 months to comply with their obligations under Articles 5 – 7 of the DMA. Based on the timeline outlined above, this is expected to be by March 2024 at the earliest.

Requirements for Qualification as a Gatekeeper

Qualitative criteria	*Quantitative thresholds*
(a) The gatekeeper has **a significant impact on the internal market**	This is presumed where: It achieved an annual EU turnover of at least **€7.5b** in each of the last 3 financial years, or its average market capitalisation or its equivalent fair market value amounted to at least **€75b** in the last financial year, and it provides the same core platform service in **at least 3 EU Member States**.
(b) It provides **a core platform service which is an important gateway for business users to reach end users**	This is presumed where: It provides a core platform service that in the last financial year had at least **45 million monthly active end users** (i.e. individuals or entities using the service other than as a business) established or located in the EU and at least **10,000 yearly active business users** established in the EU (as calculated in the manner set out in the Annex to the DMA).
(c) It enjoys an **entrenched and durable position** in its operations or it is foreseeable that it will enjoy such a position in the near future	This is presumed where: The **thresholds set out at point (b)** above were met in each of the last **3 financial years**.



Designation as a Gatekeeper



** Note also the possibility for the Commission to designate as a gatekeeper a provider of core platform services who meets the qualitative, but not the quantitative, criteria following a market investigation. The Commission must endeavour to communicate its preliminary findings within 6 months and to conclude the investigation within 12 months of the date of opening of the investigation. The gatekeeper also has a right to be heard.*

A&L Goodbody

Key contacts

Dr. Vincent Power
Partner and Head of EU, Competition & Procurement
+353 1 649 2226
vpower@algoodbody.com

Alan McCarthy
Partner - EU, Competition & Procurement
+353 1 649 2228
amccarthy@algoodbody.com

Anna-Marie Curran
Partner - EU, Competition & Procurement
+353 1 649 2227
amcurran@algoodbody.com

Micaela Diver
Partner - EU, Competition & Procurement
+44 28 9072 7592
mdiver@algoodbody.com

Lorna McLoughlin
Senior Associate - EU, Competition & Procurement
+353 1 649 2187
lmcloughlin@algoodbody.com