

Personal data

**From:** [REDACTED] [REDACTED]@apple.com>  
**Sent:** lundi 14 mars 2022 09:44  
**To:** [REDACTED] (CAB-VESTAGER); CHIRICO Filomena (CAB-BRETON); [REDACTED] (CNECT)  
**Cc:** [REDACTED]  
**Subject:** Further input on Virtual Assistants.

Dear [REDACTED], Filomena and [REDACTED],

Thank you again for taking the time to speak to us last Thursday.

As promised, we are keen to share with you some additional input to inform the debate on the inclusion of virtual assistants in the list of CPS. In our view, this would be premature given the existing level of competition in the market and the clear differences between various assistants and their functions. Such extension of scope should also require a clear analysis of the effects of each relevant obligation on virtual assistants.

Indeed, **not all virtual assistants are the same, notably from a data collection perspective, or perform the same kind of functions.** In the case of Siri, Apple's virtual assistant is not a standalone service, but primarily a user interface of the OS. Siri also benefits from the strongest privacy protections from the very beginning, and in the intervening period Apple has introduced innovative technologies, techniques, and features to minimise the amount of user data accessible to Apple or anyone else. When choosing to enable Siri, the things that a user says to Siri are not associated with the user's Apple ID but with a random identifier generated by the device's operating system.

Furthermore, it is worth noting **ongoing efforts to ensure third party interaction with Siri and wider interoperability:**

- As Apple introduces features or technologies like Siri, it works hard to make them available to third-party developers. In 2016, Apple introduced SiriKit to allow developers to enable users to interact with their apps via Siri. In 2018, Apple introduced Siri Shortcuts, extending the ability to integrate with Siri to any app in the App Store. In 2021, Apple extended Siri functionality to third-party devices via a user's HomePod or HomePod mini.
- This is also done following privacy-by-design and by default. For instance, when extending Siri functionality to third-party devices via a user's HomePod or HomePod mini, Apple ensures that user queries are processed on-device where possible and that any communications sent to remote servers are routed to secure Apple servers and are associated with a random identifier and not the user's identity. When a user makes a request via SiriKit, an app is given only the data relevant to the user's request and no more.
- Users continue to have the choice to switch to an alternative service. For example, Apple device users are able to download apps from the App Store to use alternative voice assistants, including Amazon Alexa and Google Assistant.
- As acknowledge by the EC's Final Report of its IoT Sector inquiry, there are significant industry-led efforts to ensure compatibility for device manufacturers to ensure their offers are compatible with voice assistants. [Matter already has more than 200 companies involved](#), and aims to release relevant specification mid-2022. This suggests that heavy-handed mandatory interoperability requirements may be disproportionate

On the other hand, we are **very concerned that a combination of DMA obligations focusing on virtual assistants could raise very significant privacy concerns**. Coupled with a potential extended scope of 6.1.f and requirements on defaults and choice screen, considering Siri as a standalone service under the DMA could give claims to competing virtual assistants to replace Siri as the primary voice interface on Apple's operating systems.

This is a huge concern from a privacy perspective. For example, Siri integration in iOS helps making our devices more accessible, by reading out to the deaf community all text on the device, including sensitive financial and security information (passwords, etc). Enabling voice trigger functionality (starting a voice assistant without using a button) for third parties could mean giving them the ability to have continuous background access to a device's microphone. Beyond the obvious privacy issues related to this, such move will likely results in cementing the market position of existing leading virtual assistant providers, and allow them to gather more user data - one of the key concerns highlighted in the final report of the IoT sector inquiry.

Do not hesitate to reach back to us should you have any questions.

Kind regards,

[Redacted]



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