

Google Sverige AB

Att: [REDACTED]

Only sent per mail:  
[REDACTED]

## Courtesy copy of Letter

*This is a courtesy copy translated into English of the questions in the Swedish Competition Authority's letter to Google Sweden AB, dated December 11<sup>th</sup>, 2023, case no. 288/2022.*

With regard to the Swedish Competition Authority's (SCA) investigation with case no. 288/2022, the SCA asks Google to provide the SCA with following information.

Google Sweden AB (Google) is not one of the companies subject to investigation, but the SCA assesses that Google, as provider of the services Google Ads and Google Search, has information that is relevant to the investigation.

The SCA would appreciate if the information is made available to the authority as soon as possible, however, at the latest by December 22nd, 2023.

### Requested information

The investigation concerns conducts that took place during the years of 2020-2022, and the replies should reflect the conditions of those years.

1. Can bidding on a keyword in exact match generate ad views/impressions as a result of a search query containing more words than the keyword alone?  
Additionally, answer specifically for following two examples:
  - a. Can bidding on the keyword *kry* in exact match, [kry], generate ad views/impressions in correspondence with the search query *kry ont i huvudet*?
  - b. Can bidding on the keyword *min doktor* in exact match, [min doktor], generate ad views/impressions in correspondence with the search query *min doktor ont i huvudet*?



2. In what way or ways are ad views/impressions prevented when a negative keyword consisting of only one word is added in the phrase matching type and broad matching type? If there is a difference between which ad views/impressions that are prevented from appearing when only one word, for example *kry*, has been added as a negative keyword in the match type phrase match, "kry", respectively in the match type broad match, +kry, provide examples that clarify these differences.
3. Are ad views/impressions in correspondence with the search query *min doktor* affected differently if [min doktor] or [mindoktor] has been added as a negative keyword in exact matching? If yes, specify how.
4. If a negative keyword has been added with a lowercase exact match, such as [kry], does it matter, based on which ads that are prevented, whether the search query begins with an uppercase or lowercase letter, such as *Kry* or *kry*?
5. Does it matter, based on which ads that can be displayed, if you bid on a keyword with an uppercase or lowercase letter, for example [Kry] or [kry], "Kry" or "kry", as well as +Kry or +kry? If it matters, provide examples that clarify how they differ.
6. When an advertiser extracts data from their Google Ads account on the number of ad impressions, clicks, conversions, etc., is it possible to derive from which places in the Google network the data was generated?
  - a. If yes, please specify the locations from which ad impressions can be derived within the Google search network (Google search results pages, other Google sites such as Maps and Shopping, and sites that partner with Google to serve ads) and display networks (Google sites such as YouTube, Blogger and Gmail, as well as partner websites).
  - b. If no, estimate the percentage of ad impressions that refer to advertising on Google Search.

Please address all contacts and correspondence with the Agency by referring to SCA case no. 288/2022 and indicate which information in the material that you wish to be covered by confidentiality at the SCA in accordance with the Public Access to Information and Secrecy Act (2009:400).

If you have any questions regarding this, you may contact Anna Dalshagen phone no. 08-700 16 58 or Malin Berg von Linde phone no. 08-700 15 93.