



# Geo-blocking

The internet shopping  
problems of Poles



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# Key conclusions

This report concerns problems encountered by Poles when purchasing in other European Union countries. In order to define them, we conducted research on a selected group from Poland, Germany and the United Kingdom and followed the current debate in EU institutions concerning changes that are beneficial for discriminated customers.

**According to the European Commission, geo-blocking is a commercial practice that entails blocking customers from accessing a website because of their location or redirecting them to a local website which offers different terms.** At the same time, the EU treats geo-blocking on par with other practices which prevent customers from making on-line purchases due to their location (such as a requirement to register or non-acceptance of foreign bank cards).

**Between 28 and 63 percent of online stores where Europeans shop apply regional blocking to their customers.** Mystery shopping research conducted by the EC in 2015 showed that registration from abroad was not possible in 28 percent of analysed websites, most often on account of a foreign delivery address. On the other hand, 32 percent of sellers refused to deliver goods or services to the customer's country – more than 24 percent of those offered delivery only to their home country, and almost 6 percent had an option to deliver to other EU countries but not to the actual country of the customer. Only 44 percent of websites that refused to deliver to the customer, did not contain information on where the seller is willing to deliver its products and services to. On the other hand, 26 percent of sellers did not accept foreign bank cards. In the end, it was possible to make purchases from abroad on 37 percent of the researched websites.

**Residents of eastern Europe are subject to geo-blocking more often than other EU residents.** This practice is much more widespread amongst sellers from member states which joined the EU after 2004, (84 percent.), than the “old” fifteen (66 percent). When it comes to the former group, in most cases sale restrictions assume the form of an inability to deliver goods or services abroad (52 percent) or a refusal to accept foreign bank cards (52 percent). If we split the EU countries into four regional groups (South, North, West and East), then geo-blocking is most frequently applied by sellers from the East group, which includes Poland (and also Bulgaria, Romania, Croatia, Czech Republic, Slovakia, Hungary, Slovenia, Lithuania, Latvia and Estonia). The picture is similar from consumers' perspective. Customers from the 13 countries which accessed the EU after 2004 experienced geo-blocking most often (74 percent), and in particular those from countries in the East group (74 percent). In Poland, the share of sellers who apply regional blocking is between 80 and 89 percent. On the other hand, between 71 and 75 percent of consumers experienced geo-blocking.

**In May 2016, the European Commission proposed a draft regulationsolution on geo-blocking.** It prevents sellers from blocking access to internet interfaces for customers due to their nationality, place of residence or registered business address (hereinafter in this report referred to as the “customer's origin”). Re-directing a customer to a local or national website may only take place upon their explicit consent. Sellers are obliged to sell, but not to deliver the good or service to the customer's country. Furthermore, they are prohibited from differentiating the “general terms of access” to goods or services (including the price) on account of the origin of the customer looking to make a purchase. According to the draft of the new regulation, sellers are also not permitted to demand different forms of payment (for electronic payments) from foreign customers.

**And what are the experiences and opinions of Poles who have experienced geo-blocking?** In most cases, they complain that there is no option for products to be delivered to Poland (48 percent). The cost of transport, which exceeds the value of the product of service, constitutes another barrier to purchasing (42 percent). 32 percent cite the following two issues: the product or service could not be delivered or the customer was unable to complete registration on the seller's website (e.g. unable to enter a Polish delivery address). On the other hand, 29 percent of surveyed individuals consider the product (or service) to be different from that on the website, and 26 percent say that the price exceeded that available in Poland. One fifth of respondents (21 percent) were not able to pay with a bank card issued in Poland, and 19 percent would have to pay more than the figure quoted on the store's website. Almost one in five (18 percent) were re-directed to another page, where the price was higher than on the initial website, and 9 percent could not complete the transaction, as the seller refused to make the sale. Poles who live in the UK experience similar problems when attempting to make purchases in Polish e-stores.

**Poles experience geo-blocking most often when purchasing products and not services.** 36 percent could not complete a transaction for the purchase of clothing or sports accessories, 24 percent when trying to purchase cosmetics, 23 percent for household items and toys; 18 percent for computer equipment and 14 percent when purchasing paper books, periodicals and home appliances. About one tenth (11 percent) had other problems (not included on the lists presented to survey participants). 10 percent experienced difficulties trying to purchase flight or train tickets. 9 percent had issues when purchasing music albums. Sellers apply geo-blocking least frequently for financial instrument purchases (2 percent). For electronic services, geo-blocking is most often applied by computer software sellers (so say 10 percent of respondents), electronic press (7 percent), e-learning materials (6 percent), online music (5 percent), e-books (5 percent), online films (5 percent) and software

updates (2 percent). The low percentage pertaining to software against the backdrop of other e-shopping categories may suggest that Polish consumers still commonly download content from locations other than official websites and internet stores.

**Poles who are subject to geo-blocking want better consumer protection, but they understand sellers' problems.** More than half (51 percent) think that businesses should be able to decide which countries they are willing to sell their products to and on what terms. Whereas 49 percent are of a different opinion. In the opinion of 33 percent of respondents, a business should have the right to refuse a sale to a foreign customer, but only on account of different legal and tax conditions in the customer's country; 18 percent consider that the seller should always be able to refuse a transaction, but 28 percent say that a seller should not have that right and should not differentiate their terms on account of the customer's country of origin; 21 percent consider that a business should not have the right to refuse a sale to a foreign customer, but may offer different terms on account of the customer's country of origin.

**Poles want card payments to be accepted, deliveries to be possible and to be informed if they are re-directed to another site.** Most of those who experienced geo-blocking would want an obligation for sellers to accept bank cards issued in any EU country (64 percent). A similar group would back a prohibition on re-directing a foreign customer to another website with products and services tailored to their country of origin without explicit consent (61 percent). Almost the same number of people (60 percent) would require all sellers to deliver digital content (music, software, computer games) to a foreign customer regardless of their country of origin. More than half of respondents (59 percent) would introduce a requirement for foreign sellers to deliver goods or services to every EU country. On the other hand, 57 percent would force the sale of audio-visual content (film, television) to a foreign customer regardless of their country of origin.

#### **We propose five recommendations to be implemented to EU law:**

- 1 The law applicable to businesses under "passive sales" should be made more explicit – companies that are part of European consultations as well as Polish consumers are demanding this.
- 2 Expanding the scope of provisions by other goods and services, including contents subject to copyright, should be considered. Although Poles in most cases do not purchase films online, they lack legal access to works of this type, which may incline them to look for ways of acquiring them that are not in accordance with the law.
- 3 The ban on automatic re-directing of customers to regional or national sites should be upheld. Poles who are subject to geo-blocking demand this.
- 4 Provisions on accepting online payments made with a foreign card should be kept.
- 5 Geo-blocking should be considered separately from differentiating prices by e-shops in EU countries.
- 6 The problem associated with the considerable cost of trans-border deliveries has to be resolved as sellers often decide not to offer their products to foreigners because of this.

# What is geo-blocking?

**The European Union does not have an official and single definition of geo-blocking. Whereas, according to the European Commission, geo-blocking is a commercial practice that entails blocking customers from accessing a website because of their location or redirecting them to a local website which offers different terms<sup>1</sup>. At the same time, it treats geo-blocking on par with other practices which prevent customers from making on-line purchases due to their location (such as a requirement to register or non-acceptance of foreign bank cards).**

**Geo-blocking is not a prohibited practice. It is possible by geolocating a customer using their IP address, data from the browser they use or the operating system, their delivery address, telephone number or bank card. The Commission ordered that the geo-blocking phenomenon be investigated in 2015 - there was a suspicion that it might constitute a significant obstruction to the development of the single digital market.**

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## Types of blocking and price differentiation

For the needs of conducting EU market research in terms of geo-blocking<sup>2</sup>, the European Commission specified that it can assume the following forms:

- refusal to sell to another country at any stage of placing an online order,
- automatic re-directing of a customer to another site (most often of the country where they currently are) without their consent and/or knowledge or possibility to by-pass the re-direction,
- a change in the terms of sale, including price, due to the country in which the consumer is (more often referred to as geo-filtering).

Geo-blocking may be justified by laws that restrict access to tobacco products or online gambling in certain EU countries for example. For services which entail access to works protected by copyrights and licence agreements, it stems from the territorial nature of those rights – such services may only be provided within the area which is covered by the licence.

**Furthermore, geo-blocking may result from agreements between suppliers and distributors, which impose geographic restrictions on the latter in terms of sales of products or services (the Commission is looking at this phenomenon, in its investigation of the EU e-commerce market in terms of the EU competition protection law)<sup>3</sup>.**

**In the remaining cases, geo-blocking is a consequence of the business decisions of a seller who does not want to provide its goods or services outside of certain markets in the EU which it selected.**

This is because businesses avoid countries which apply different VAT rates or consumer regulations or have different requirements in terms of product labelling. They are also dissuaded by the high cost of foreign deliveries and complications of a legal nature - often businesses are not sure aware which law is ultimately effective in transactions of this type: the seller's or the consumer's<sup>4</sup>.

The geo-blocking phenomenon within the EU market was analysed pursuant to an instruction by the Commission in December 2015<sup>5</sup>. The mystery shopping method was used (a procedure for evaluating service quality by assuming the role of a customer and attempting to complete a transaction) to verify more than 1000 websites in all EU member states which sell products and services most often purchased online (in accordance with the 2015 single digital market consumer survey<sup>6</sup>). Internet sales of the following products and services was investigated:

- clothing, footwear and accessories, electronic equipment and computer hardware, books, electrical household goods, cosmetics and hair products, software and computer games,

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1 ComEur, 2016a.  
2 ComEur, 2016b.  
3 ComEur, 2016c.

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4 ComEur, 2016d.  
5 ComEur, 2016b.  
6 ComEur, 2015a.



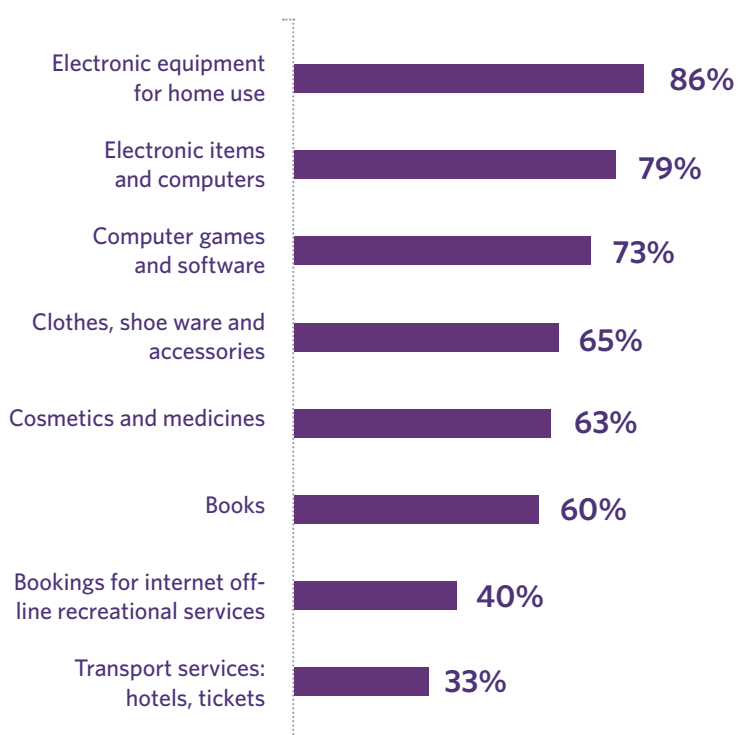
**CHART 1. TRANS-BORDER ONLINE SHOPPING:  
MORE DIFFICULT WITH EVERY STEP**  
PERCENTAGE OF SUCCESSFUL COMPLETIONS  
OF SUBSEQUENT INTERNET SHOPPING STAGES

Source: In-house materials based on ComEur, 2016b data.



**CHART 2. GOODS AND SERVICES:  
HOW DIFFICULT IS IT TO PURCHASE ABROAD?**  
SCALE OF BLOCKING ACCESS TO GIVEN  
GOOD AND SERVICES (WEIGHTED VALUE)

Source: In-house materials based on ComEur, 2016b data.



- travel (air tickets, car rental, hotel bookings) and entertainment (concert tickets, sports events, amusement parks) services provided off-line.

The commission excluded access to digital content, including content subject to copyrights from the mystery shopping survey, as these are not purchased via the internet as often as the aforementioned products and services provided off-line<sup>7</sup>.

**The mystery shopping research demonstrated that blocking access to a website to a foreign customer is rare** - it was only encountered on 2 percent of the investigated websites, whereas a re-direction to a site with a country-specific extension was much more prevalent (1.1 percent, www.shop.de/poland for example) or one with a different domain (0.1 percent). Only for 0.5 percent of pages accessed from abroad were entirely blocked. **This, however, does not mean that Europeans can make trans-border purchases without problems.** Registration was required on almost all the sites (92 percent) in order to make a purchase. Registration from abroad was not possible on 28 percent of websites, most often on account of a foreign delivery address. 32 percent of the investigated sellers refused to deliver goods or services to a different country. More than 26 percent of those offered delivery only to their home country, and around 6 percent had a facility to deliver to other EU countries but not to the actual country of the customer. Furthermore, only 44 percent of websites where the customer experienced geo-blocking contained information on where the seller delivers its products and services to. 26 percent of sellers did not accept foreign bank cards. **In the end, it was possible to make purchases from abroad on 37 percent of the investigated websites (see CHART 1).**

Interestingly, the sale of goods rather than services was subject to geo-blocking more often. For the former, customers faced most problems with purchasing home appliances and electronics (86 percent), and least when purchasing books (60 percent) (see CHART 2).

Mystery shopping investigation results were only partially confirmed by public consultations, also conducted by the European Commission in 2015.<sup>8</sup> **Among surveyed consumers making trans-border e-purchases 90 percent encountered geo-blocking** or another form of restrictions on account of their location. Most often - when purchasing goods - the seller refused to deliver (including re-directing to another site), refusal to deliver and price differentiation (mainly when

<sup>7</sup> Whereas 95 percent of the respondents made at least one purchase during the past 12 months of goods and services offered off-line, on-line services were purchased by 20 percent and access to digital content was purchased by 44 percent.

<sup>8</sup> ComEur, 2016e.

purchasing: clothing, footwear and accessories, books as well as computer equipment and electronics). Difficulties were also encountered when purchasing services. There were difficulties with access to streamed data, e-books, mp3s, games and computer software as well as off-line travel associated services.

**As many as 63 percent of businesses experienced geo-blocking** or other restrictions associated with their location in relations with other businesses (B2B), and **45 percent admitted to applying such themselves** (however, only a small number of responders actually answered this question). 433 entities were part of the Commission's consultations, out of which more than half were from four EU member states and represented consumers.

The mystery shopper investigation also looked into the price differentiation issue, but only to a small extent, as the EC considers that the phenomenon is not the same as geo-blocking. Results: where the seller's site was visited from their home country and from abroad, customers noticed a difference in price in only 9 percent of the cases. Whereas for 5 percent of compared products the price for a foreign purchaser was higher than that seen by a customer visiting the seller's site from the seller's country.

The practice of price differentiation – considered as a form of geo-blocking<sup>9</sup> – in the EU digital market, is being looked into more thoroughly by the Digital Economy Lab of the University of Warsaw (DELab UW). The organisation investigated airfares and accommodation prices available through aggregators, and did not notice differences on account of the customer's location. That diagnosis was also confirmed by a mystery shopping investigation conducted directly on websites of air carriers and hotels. Whereas a quantitative analysis of prices for popular products (prices obtained from price comparison sites in 25 EU member states) showed differences in the order of a dozen or so percent, with higher prices in Scandinavian countries, the United Kingdom and France for example and lower in Poland, Czech Republic and Hungary. **DeLAB argues that the price differences are associated with the wealth of the given country as well as cost factors, thus the application of this practice in business is justified. This statement applies to markets where sellers direct their goods, and not to customers who approach them individually.**

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## Frequency of the phenomenon

The mystery shopping investigation ordered by the European Commission highlighted geographic differences in the application of geo-blocking by internet sellers. This practice is much more widespread amongst sellers from member states which joined the EU after 2004<sup>10</sup> (84 percent), than the "old" fifteen<sup>11</sup> (66 percent.). When it comes to the former group, in most cases sales restrictions assume the form of an inability to deliver a good or service abroad (52 percent) or refusal to accept a foreign bank card (52 percent). If we split the EU countries into four regional groups (South, North, West and East), then geo-blocking is most frequently applied by sellers from the East group, which includes Poland (and also Bulgaria, Romania, Croatia, Czech Republic, Slovakia, Hungary, Slovenia, Lithuania, Latvia and Estonia) (see **CHART 3.**).

The picture is similar from consumers' perspective. Geo-blocking was most often experienced by customers from the 13 countries which accessed the EU after 2004. (74 percent), and in particular those from countries in the East group (see **CHART 4.**).

According to the mystery shopping research conducted by the EC, in Poland the share of sellers who apply regional blocking falls in the 80 to 89 percent range. On the other hand, between 71 and 75 percent of consumers experienced geo-blocking.

Different data is provided by the Eurobarometer published in 2014<sup>12</sup>. Among surveyed Poles who purchase on foreign websites, only 6 percent experienced non-acceptance of Polish bank cards, 8 percent said that goods could not be delivered to Poland and 10 percent were re-directed to a Polish website with a different price. 80 percent did not encounter any problems whatsoever; however, the survey did not include questions regarding other forms of geo-blocking or a question on whether the purchase from another EU member state was actually successfully completed (see **CHART 4.**).

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9 K. Śledziewska, A. Pacewicz, M. Sobolewski, B. Okoń, K. Gyódi, M. Ziemiński, 2016.

10 Poland, The Czech Republic, Slovakia, Hungary, Slovenia, Malta, Cyprus, Romania, Bulgaria, Lithuania, Latvia, Estonia, Croatia.

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11 Germany, Austria, France, Italy, Great Britain, Ireland, Belgium, The Netherlands, Luxembourg, Spain, Portugal, Greece, Denmark, Sweden, Finland.

12 Directorate-General for Communication, 2015.

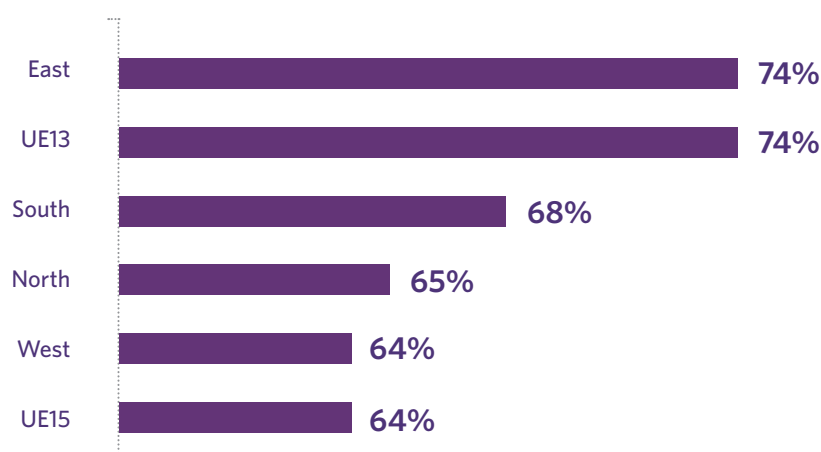
**CHART 3. SELLERS: WHERE DO THEY APPLY GEO-BLOCKING MOST OFTEN?**  
SCALE OF GEO-BLOCKING ACCORDING TO THE SELER'S REGION (UNWEIGHTED VALUE)

Source: In-house materials based on ComEur, 2016b data.



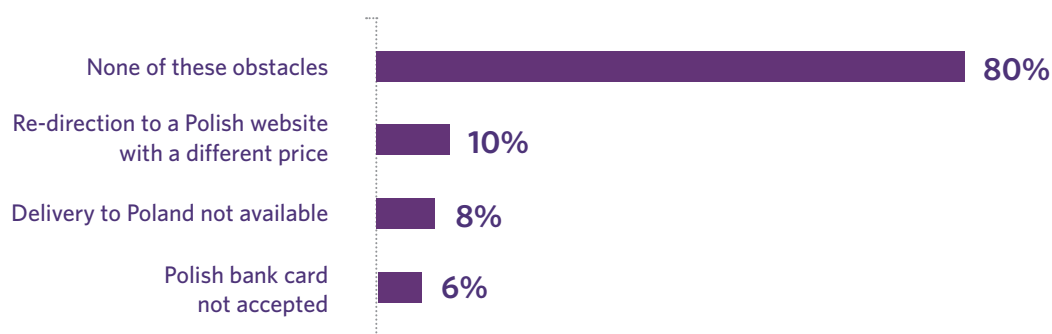
**CHART 4. CONSUMERS: WHERE ARE THEY GEO-BLOCKED MOST OFTEN?**  
SCALE OF GEO-BLOCKING ACCORDING TO THE CUSTOMER'S REGION (UNWEIGHTED VALUE)

Source: In-house materials based on ComEur, 2016b data



**CHART 5. TRANS-BORDER ONLINE SHOPPING: THE EXPERIENCE OF POLES**  
EFFECTIVENESS OF PURCHASES BY POLES FROM FOREIGN WEBSITES

Source: In-house materials based on Eurobarometer.

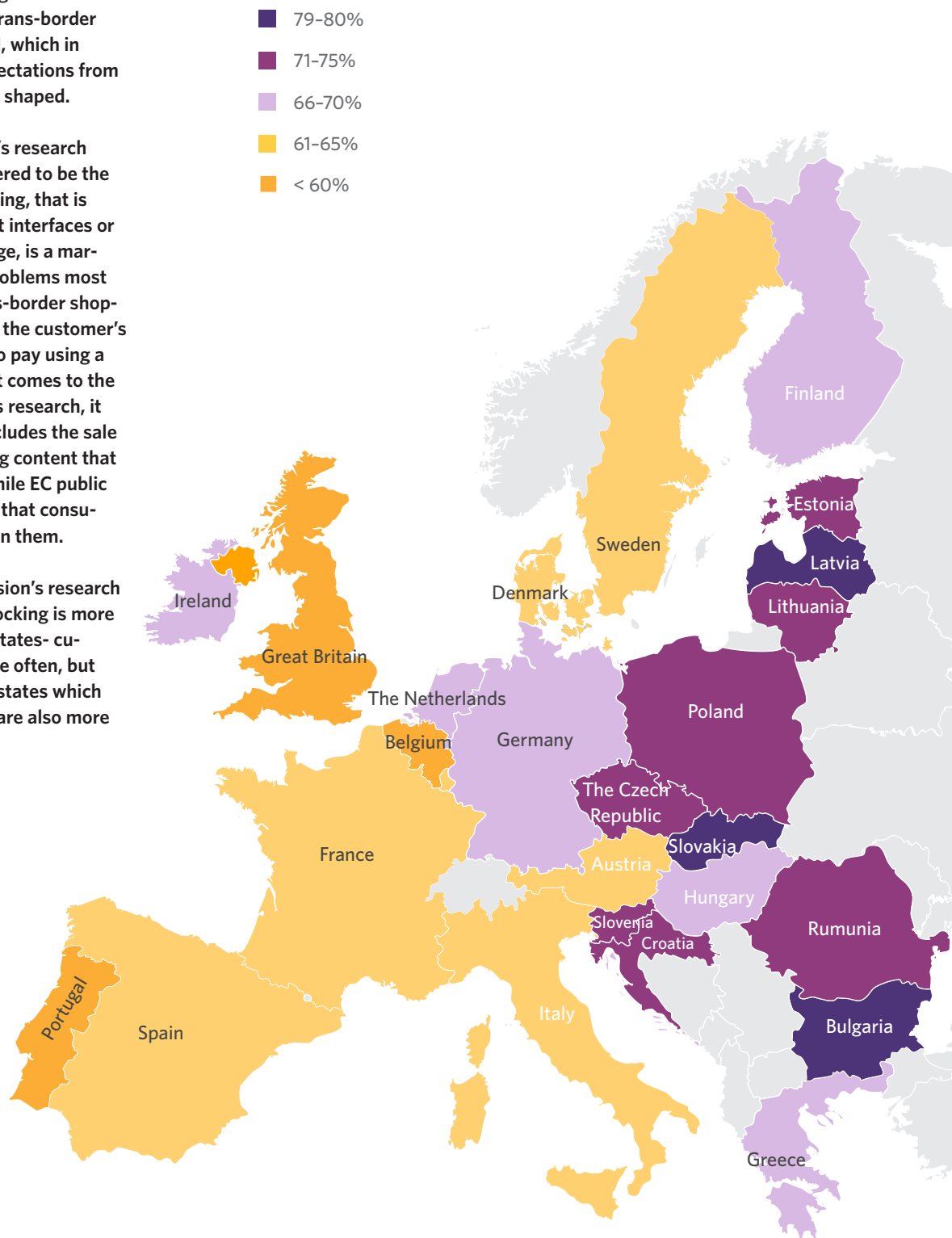


## SUMMARY

- » The lack of a cohesive and official definition of geo-blocking in the EU means that different practices are described using that term. The European Commission for example, focuses on subsequent stages of the process of purchasing from foreign websites and practices which ultimately prevent it. When conducting market studies it treats the phenomenon of price differentiation very briefly, contrary to, DeLAB, which recognises it as a form of geo-blocking. This leads to different diagnoses of trans-border e-commerce being formed, which in turn causes divergent expectations from regulatory solutions being shaped.
- » Whereas the Commission's research shows that what it considered to be the quintessence of geo-blocking, that is blocking access to internet interfaces or re-directing to another page, is a marginal phenomenon. The problems most often encountered in trans-border shopping are: refusal to ship to the customer's country and the inability to pay using a foreign bank card. When it comes to the scope of the Commission's research, it should be noted that it excludes the sale of digital content, including content that is subject to copyright. While EC public consultations have shown that consumers are most interested in them.
- » Furthermore, the Commission's research demonstrates that geo-blocking is more common in new member states- customers experience it more often, but businesses from member states which joined the EU since 2004 are also more likely to apply it.

### MAPA SCALE OF GEO-BLOCKING ACCORDING TO THE CUSTOMER'S REGION (WEIGHTED VALUE)

Source: In-house materials based on ComEur, 2016b data.



# Debate on geo-blocking in the EU

**The use of geographic blocking in e-commerce is sometimes unjustified. One of the European Commission's priorities set forth in the single digital market strategy passed in 2005 is a solution to just that problem. The Commission announced legislative actions, then at a strategic document level it separated the issues of geo-blocking in e-commerce and the lack of trans-border access to content subject to copyright. It treats the latter issue as a separate priority (modernisation of copyrights). In May 2016, it proposed a draft regulation on geo-blocking<sup>13</sup>.**

## The European Commission's proposal

**The Commission's draft prevents traders from blocking access to internet interfaces for customers due to their nationality, place of residence or registered business address** (hereinafter in this report referred to as the "customer's origin"). Re-directing a customer to a local or national page may only take place upon their explicit consent, without preventing access to the page which they visited in the first place. The Commission defines situations which **cannot** be used as a basis for refusing to sell to a customer due to their origin:

- the seller does not deliver its goods to the customer's country;
- the seller sells services other than access to protected content, e.g. subject to copyrights;
- the seller provides services in its premises or in the country within which it conducts its business.

**Furthermore, sellers are prohibited from differentiating the "general terms of access" to goods or services (including the price) on account of the origin of a customer who wants to make a purchase.** In this way, the Commission defines "passive sale", or such which does not impose any additional obligations on the seller apart from those which stem from its actions in the country within which it is actually operates or to which it addresses its products and services (sell like at home). Thus, in the Commission's assessment, "passive sales" do not expose sellers to additional costs associated with trans-border trading, on account of VAT settlements, consumer protection or the performance of obligations towards a foreign customer which exceed those considered to be standard.

From the customer's perspective, this means that purchases can be made subject to the same terms as a local customer, e.g. a Pole purchasing from a Czech seller whose goods and services are only addressed to recipients in the Czech Republic has to collect the goods from a Czech collection point, and has to pursue its consumer rights on the basis of Czech provisions. Neither can they count on after-sales service (assuming that it is limited to the territory of the Czech Republic) nor on information from a helpline in a language other than Czech.

**According to the draft of the new regulation, traders are also not permitted to demand different forms of payment (for electronic payments) from foreign customers.** In practice this means acceptance of payments made using foreign bank cards in the payment system (VISA, MasterCard) in use by the seller and the acceptance of bank transfers from a foreign bank account.

**The Commission's proposal includes B2B sales, as long as an enterprise is not purchasing with a view to reselling. It also includes non-EU businesses which address their goods and services to any one EU member state.** Additionally, it prohibits the conclusion of agreements which prohibit sellers from making "passive sales" to foreign customers, which in practice primarily pertains to distribution agreements that impose geographic restrictions on the sale of goods and services. The EC's proposal does not apply to the provision of services regulated by separate provisions in the EU, including selling access to content subject to copyright, access to retail financial services (including payment services) and transport services.

<sup>13</sup> ComEur, 2016f.

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## Consumers' position

BEUC, the largest European consumer organisation, positively assesses the European Commission's proposal<sup>14</sup>. However, it criticises the fact that it did not take into account services, which consumers use frequently, primarily access to non-audio-visual digital content subject to copyright (music, e-books) as well as audio-visual services (e.g. on-line transmissions) where access from abroad is limited on account of licence agreements. BEUC is also demanding that consumer rights are reinforced by informing the customer, prior to making a purchase, which countries the seller delivers goods and services to, as well as that if a delivery is arranged independently, this entails assuming the risk of the goods being damaged in transport. It also demands expansion of the non-discrimination principle to the after-sales service provided by the seller, which should be available to customers regardless of their origin. Additionally, BEUC postulates the introduction of a universal obligation to accept debit cards issued under national payment systems (e.g. BankContact in Belgium or iDeal in the Netherlands). It also wants an introduction of financial penalties for businesses that do not observe the new provisions.

**Also the National Council of the Polish Consumers' federation supports the postulate to expand geo-blocking prohibition on services enta-**

**iling access to content subject to copyrights and licensing agreements (streaming, on-line transmissions). It argues that this is where Polish consumers experience geo-blocking most often,** and the federation does not receive many complaints regarding problems with trans-border purchases of goods and services subject to the Commission's proposal. The DeLAB UW Digital Economy Lab also subscribes to this position. At the same time, this organisation is critical of the idea of including the price in the "general terms of access" to goods and services, which businesses are unable to differentiate on account of the customer's origin. Citing its own research, DeLAB shows that differentiating prices is justified by objective premises, which act both to the advantage of the customer (reflecting the purchasing power in the given country) as well as the business (taking into account operating costs). StartUp Poland is of a similar opinion – the organisation is against geo-blocking which results from the application of different regulations by EU countries, but rather is for maintaining the ability by internet sellers to differentiate prices<sup>15</sup>. That discussion centres around differentiating prices across different EU markets and not in relation to individual customers.

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## Business position

Business Europe (BE), the largest organisation representing business interests in Brussels, is critical about the European Commission's new legislation proposal. Business people think that geo-blocking stems from existing barriers in the internal EU market: differences in national regulations, VAT rates, operating costs or parcel delivery systems<sup>16</sup>. They think that the Commission's proposal does not address these real problems. Business people see "passive sales" (sell like at home) proposed by the Commission as an obligation to sell which affects the freedom to conduct business, including to sell to selected markets. It is worried that contrary to the Commission's intentions, "passive sales" to foreign customers will burden sellers with obligations stemming from provisions of the country which the customer is from, associated with different technical standards, consumer and contract law, product

markings or user manual language. **Thus, business people demand guarantees that when selling on the basis of the new regulation, a trader will only be subject to the provision of the country within which it is conducting its business.**

BE also emphasises the significance of after-sales service, which plays an increasingly significant role in product and service sales strategy, as it links the customer with the business for an extended period after the sale. Whereas "passive sales" exclude the provision of after-sales services (and if such were available to foreign customers, the business would have to incur additional costs every time - provision of such a service in a country where it does not normally provide it).

**Additionally, business people criticize the need to obtain an explicit consent from the customer to be re-directed to a different website.** There is a worry that the provision may mean a necessity to

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14 BEUC, 2016.

15 M. Pawlak, 2016.

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16 Business Europe, 2016



apply further (apart from information on cookies) pop-up windows, which will make it more difficult for consumers to browse sellers' websites. With reference to services provided within the country of the enterprise or at its premises (e.g. car rental, hotel accommodation, concerts and sports events tickets), Business Europe considers that a business has to be able to differentiate the terms due to varied holiday and vacation seasons in different countries.

**The Polish Confederation Lewiatan, as a Business Europe member, supports the position of that organisation<sup>17</sup>. It indicates that without changes the draft may have results which are opposite to those which are intended, i.e. it will dissuade businesses from expanding their operations abroad.**

On the other hand, the IAB Polska Internet Industry Employers' Association is of the opinion that re-directing customers to interfaces other than the one which were originally searched does not constitute anticompetitive action, but intends to direct them to a page which reflects their needs – e.g. has a version in the consumer's own language. On the other hand, the Polish Cosmetics Industry Association points to detailed provisions applicable to given product groups, such as an obligation to provide product information in the customer's language. In the opinion of the Association, the "passive sales" proposed by the Commission, which forces a seller to sell without imposing an information obligation, endangers the customer's safety.

## SUMMARY

- » The geo-blocking provisions proposed by the Commission seem fairly controversial. The primary objection from consumers pertains to too narrow scope for the draft, which does not take into account access to digital content subject to copyright – consumer organisations pointed this out both during social consultations prior to the publication of the draft as well as during the assessment stage of the proposed provisions. The Commission however excluded content subject to copyright as early as at the stage of investigating the geo-blocking phenomenon on the EU market, basing its decision on other research showing that they are rarely purchased via the internet.
- » Adoption of copyright to the needs of the digital economy is the Commission's priority; however, suggestions within this area are limited. Work on trans-border access to content subject to copyright is underway in Brussels<sup>18</sup>; however, it only pertains to temporary access abroad to services which are purchased in Poland for example. The Commission also suggested provisions that aim to facilitate licensing of trans-border on-line transmissions and re-transmissions of TV programmes<sup>19</sup>. However, they do not foresee a prohibition on issuing territorial licences, which are the most common cause for blocking access to on-line television programmes.
- » On the other hand, companies support exclusion of content subject to copyright from geo-blocking regulations. However, business have other serious reservations. In their opinion the new regulations will generate legal uncertainty and will disrupt the freedom to conduct business. Additionally, they are worried that the obligation to sell imposed on sellers might lead to a deterioration of a company's image – customers without full consumer protection or after sales service might not be satisfied with their purchase. The position of businesses on the legal uncertainty surrounding the negotiations in Brussels is shared by member states, who use many of the same arguments during negotiations at the Council.

<sup>17</sup> Lewiatan Confederation, 2016.

<sup>18</sup> ComEur, 2015b.

<sup>19</sup> ComEur, 2016g.

# How do Poles experience geo-blocking?

**The Commission's research shows that internet users in Central-Eastern Europe are more likely to encounter problems with making trans-border internet purchases than other Europeans. When it comes to Poles making purchases in foreign stores, the geo-blocking percentage varies depending on the applied geo-blocking definition - from 28 percent to 63 percent.**

**For the needs of this report, we determined that geo-blocking means problems with purchasing products or services from a different country caused by living in Poland or temporary residence in the United Kingdom or Germany.**

**According to those surveyed, the most common difficulty is failure by the seller to deliver products or services to Poland -**

declared 48 percent of those who experienced geo-blocking<sup>20</sup>. The cost of transport, which exceeds the value of the product of service, constitutes a second barrier to purchasing - 42 percent of respondents. One third (32 percent) cite the following two issues: product, service was not delivered or the customer was unable to complete registration on the seller's website (e.g. unable to enter a Polish delivery address). On the other hand, 29 percent of those surveyed consider the product (or service) to be different from that on the website, and 26 percent say that the price exceeded that offered in Poland. One fifth of respondents (21 percent) were not able to pay with a bank card issued in Poland, and 19 percent would have to pay more than the figure quoted on the store's website. Almost one in five (18 percent) of those who experienced geo-blocking were re-directed to another page, where the price was higher than on the initial website, and 9 percent could not complete the transaction as

the seller refused to make the sale. Poles living in Germany and the United Kingdom also experience these difficulties. In 45 cases out of 100, the product or service was not delivered and in 36 cases the seller did not offer products or services delivery to the country where the surveyed person currently resides. 32 percent of those surveyed noticed a difference between the purchased product (or service) and how it was presented on the website. For 18 percent, the cost of transport would exceed the value of the order or the product price exceeded that available in the United Kingdom or Germany. For 14 percent of consumers, the seller required registration, which was not possible from those countries. The same percentage was re-directed to another page in accordance with the country from which they logged in, which meant that the price or product was different from the version available on a Polish website for example. In 9 percent of cases, the seller did not accept guarantee complaints and 5 percent of those surveyed claim that they were unable to use a Polish bank card to pay for their purchases.

## Manifestation of geo-blocking in various sectors

Poles experience geo-blocking most often when purchasing products and not services. 36 percent could not complete a transaction for the purchase of clothing and sports accessories, 24 percent when trying to purchase cosmetics, 23 percent for household items and toys; 18 percent for computer equipment and 14 percent when purchasing paper-based books, periodicals and home appliances. About one tenth (11 percent) had other problems (not included on the lists presented to the survey participants). 10 percent experienced difficulties trying to purchase flight or train tickets. 9 percent had issues when purchasing music albums. Sellers apply geo-blocking least frequently for financial instrument purchases (2 percent).

For electronic services, geo-blocking is most often applied by computer software and applications sellers (so say 10 percent of respondents), electronic press (7 percent), e-learning materials (6 percent), online music (5 percent), e-books (5 percent), online films (5 percent) and software updates. The low percentage pertaining to software against the backdrop of other e-commerce categories may suggest that Polish consumers are still used to downloading content from locations other than official websites and internet stores.<sup>21</sup> (see **CHART 6.**)

<sup>20</sup> Survey commissioned by Polityka Insight carried out by IQS research agency on a sample of 100 individuals, who experienced geo-blocking whilst shopping on the internet. The survey was performed using the CAWI method on Opinie.pl, an internet site owned by OQS and in under RTS (invitations to take part in the survey displayed on Polish websites with extensive reach, with country specific IP targeting)

<sup>21</sup> According to the most recent BSA Global Software Survey 48 percent of software in Poland is used without a licence with the European average of 29 percent. Ukraine is the inglorious European piracy leader (82 percent), followed by Russia (64 percent) and Greece (63 percent) - BSA, 2016.



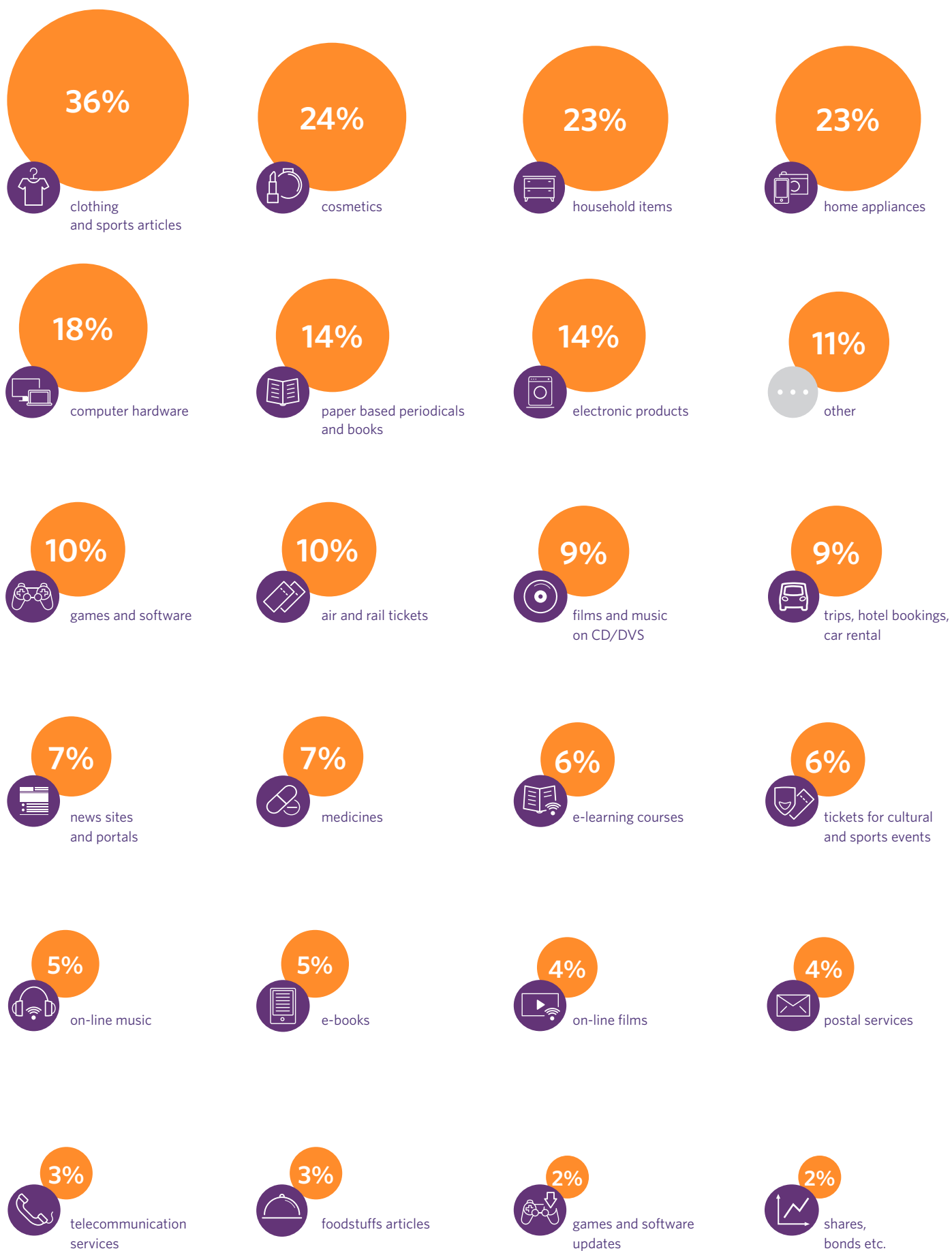
**SHIPPING IN A FOREIGN E-STORE  
PROBLEM HIERARCHY:  
PERCENTAGE OF INTERNET USERS  
LOGGING IN FROM POLAND**

Source: In-house materials based on IQS.



**CHART 6. SELLERS OF CLOTHING, COSMETICS AND TOYS ARE MOST LIKELY TO APPLY GEO-BLOCKING**  
 PERCENTAGE OF INTERNET USERS LOGGING IN FROM POLAND

Source: In-house materials based on IQS.





### Clothes and sports articles

According to respondents, the most frequent problem is failure to deliver a product to Poland (44 percent). This is followed by: cost of delivery exceeding the cost of the product (32 percent), failure to deliver a parcel (26 percent), differences in the appearance of the delivered product and that on the website (21 percent), inability to register from Poland (18 percent), Polish bank card not accepted (15 percent), differences in the price/product when paying or on the purchase page in relation to the advertised price (9 percent), failure to accept guarantee returns (9 percent), product price too high compared with prices available in the given country's shops, re-directed to a page dedicated to Polish consumers, where the prices were different to those offered to international customers (6 percent), sale refused (3 percent).



### Cosmetics

Those who experienced geo-blocking had to deal with the following problems: price significantly higher than that in Poland (35 percent), delivery to Poland not available (30 percent), delivery cost too high (22 percent), failure to deliver to Poland (22 percent), no option for returns, differences between the advertised and received products (17 percent each).



### Household items, furniture or toys

Most people had problems with the cost of delivery, which would exceed the value of the purchased household product (36 percent), followed by the seller not accepting a bank card issued in Poland or failure to deliver the product to Poland (27 percent each). In 18 percent of cases the seller required registration, for which a Polish address was not accepted.



### Home appliances and mobile telephones

One third of consumers from Poland (32 percent) were re-directed to another page when paying, in 27 percent of cases the price of the product was different than that on the website, the same percentage did not receive their order and 23 percent each were unable to make a complaint or the goods could not be delivered to them (as the shop does not deliver to Poland) or claimed that the cost of delivery exceeded that of the purchase electronic products.



### Computer hardware

24 percent of those surveyed attempting to buy computer hardware indicated that the cost of transport was higher than the price of the products they wanted to purchase. On the other

hand, 18 percent were unable to purchase a product as the seller refused to sell or did not offer delivery to Poland, and 12 percent noticed that the price on the payment page was higher than the advertised price.



### Paper-based periodicals and books

In 46 cases out of a 100, the seller did not offer delivery of books or periodicals to Poland. In 38 cases, the delivery prices exceeded the cost of the book or payment using a Polish debit or credit card was not possible. 15 cases out of 100 experienced a refusal to sell, a different price than that advertised, the product not delivered, the price of books or periodicals higher in a foreign shop than in a Polish shop.



### Home appliances

Issues encountered most often: price of home appliances were lower than the price of delivery from a different country (31 percent), price of products exceeded those in Poland or the product was not delivered (23 percent). Other problems with geo-blocking were indicated by 15-18 percent of consumers.



### Games and software

Almost half the potential buyers of games and software (44 percent) were unable to purchase products as the seller did not offer delivery to Poland, 22 percent each encountered a problem with delivery or card payments. Other responses such as re-direction to a different page, price difference, refusal to sell or cost of transport too high (exceeding that of the purchased software) were indicated by 11 percent of the respondents.



### Air or rail tickets

Nearly half of respondents purchasing tickets in a foreign store were unable to register on the website as it was not possible to enter a Polish address. A similar percentage were re-directed to a different page, where the price of tickets was higher than that advertised on the global page. 22 percent of respondents each experienced price differentiation when paying, failure to deliver a ticket or inability to pay using a Polish card. 11 percent could not return the product or noticed that the ticket price was higher than that available in Poland.



### Films and music on CD/DVDs

38 percent of individuals who experienced problems with purchasing music or films, could not complete registration in the shop as a Polish address could not be entered, did not receive their product (delivery to Poland not available) or would have to pay more for the goods (the price exceeded the Polish price).



### Trips, hotel bookings and car arsenate

The problems encountered most often include: Polish cards not accepted, unable to make a return (38 percent each), price higher than that available in Poland, difference in the price when making payment as compared to the advertised price (25 percent each).



### News sites and portals

The most common problem faced by those purchasing foreign media is being re-directed to a page dedicated to customers from Poland, where the price was higher than the general price - according to 29 percent of respondents. Apart from that, 14 percent cite: unable to register a Polish delivery address, product not delivered to Poland, no option for returns, difference in the advertised and delivered products or differences in prices as compared to that available in Poland.



### Medicines

More than half of those attempting to purchase medicines (57 percent) were unable to do so as the seller did not offer delivery to Poland. On the other hand, 43 percent would have to pay more for the delivery than the product itself or its price would be higher than in Poland.



### E-learning courses

Buyers of internet courses primarily complain about the price of the product significantly exceeding that available in Poland (100 percent of cases) and additionally they experience problems with returns or refusals to sell.



### Tickets for cultural and sports event

One third of respondents were unable to enter a Polish address when registering or payment with a Polish bank card was not accepted.



### On-line music

More than half of respondents (60 percent) who encountered difficulties with purchasing music in electronic format over the internet state that the advertised price was higher than the price which actually had to be paid. 20 percent each encountered problems associated with a failure to deliver the service to their country or did not received the purchased music.



### E-books

40 percent each of those trying to purchase digital books state that the final price was different to that on the international page, or were re-directed to another page with a higher price for that same book. One fifth found that the e-book

could not be delivered and the same number of people did not receive an ordered e-book or could not return the product.



### On-line films

Half the people who purchased films on the internet from a seller in a different country had to pay more than was advertised on the website. One quarter each of the respondents state that: they were unable to watch the film after making a purchase, received a film of poorer quality than the one advertised or the price was higher than for a similar service in Poland.



### Postal services

Half the people who encountered problems with purchasing postal services ultimately did not receive their parcel or noticed differences between the service and its description on the website. While one quarter each indicated: inability to register the sender's address in Poland, differences in the price, unable to pay with a Polish bank card, failure to accept a guarantee complaint or noticed that the price for the service was higher than that available in Poland.



### Telecommunication services

Most of those looking to purchase internet access or a mobile phone contract were re-directed to a different page, dedicated to their country, where it was more expensive (67 percent). One third were not able to pay with a Polish card or did not receive the product.



### Foodstuffs, fruit and vegetables

Those trying to purchase such products from different countries listed the following barriers: goods not delivered (67 percent), no facility to make a guarantee complaint, delivery to Poland not available, re-direction to a different page with prices higher than those in Poland (33 percent each).



### Games and software updates

All respondents trying to make such purchases declared that the price of the service was higher than in Poland or the country which they were residing in at the time. Half were refused the sale or unable to make a return.



### Shares, bonds etc.

For half the individuals who purchased shares or bonds from a foreign financial services provider, when attempting to make a purchase, redirection to a different page (regional or national) where the products and prices were different from those originally shown.

## Geo-blocking in the opinion of Poles

### PROFILE OF A POLE WHO IS SUBJECT TO GEO-BLOCKING

**99 percent**

use social networking sites

**57 percent**

hold a bachelor's degree at the last

**32 percent**

live in a town with more than 500 thousand residents

**17 percent**

in towns of up to 20 thousand residents

**7 percent**

in rural areas

**In the opinion of most participants, everybody in the EU should be offered the same terms when making purchases**, e.g. the price should be similar, delivery and the guarantee terms should be similar (70 percent of respondents). One fifth are against this and one in ten do not have an opinion on this.

**However, Poles do not represent a unified front when it comes to the protection of consumers' rights.** Two fifths (40 percent) consider that when making e-purchases with a foreign seller their rights should be protected under Polish law. One in three (34 percent) disagree with this statements and 26 percent do not have an opinion. At the same time, 59 percent of respondents consider that when making trans-border internet purchases, they should be protected by regulations in force in the seller's country (just as is the case when making a purchase in a bricks-and-mortar shop in an EU country).

Those who are subject to geo-blocking are divided as to the superiority of the consumer's rights over the sellers' rights. **More than half (51 percent) think that the business should be able to decide which countries they are willing to sell their products to and on what terms. Whereas 49 percent are of a different opinion.**

**Most of those who experienced geo-blocking would want an obligation for sellers to accept bank cards issued in any EU country (64 percent).**

A similar group would back a prohibition on redirecting a foreign customer to another website with products and services tailored to their country of origin without an explicit consent (61 percent). Almost the same number of people (60 percent) would oblige all sellers to deliver digital content (music, software, computer games) to a foreign customer regardless of their country of origin.

**More than half the respondents (59 percent) would introduce an obligation for a foreign seller to deliver goods or services to every EU country.**

On the other hand, 57 percent would force the sale of audio-visual content (film, television) to a foreign customer regardless of their country of origin. Slightly fewer would be in favour of prohibiting blocking foreign customers' access to a website advertising the sale of goods and services, even if the customer will not be able to make a purchase there (56 percent of respondents). However, one in five have no opinion on the matter, and 24 percent would be against such a move (see **DIAGRAM 7**).

**Protection of business' rights is less important to respondents than consumers' rights.** Almost

half (46 percent) the respondents would want an obligation to sell to a foreign customer without an option to differentiate the terms (e.g. price) depending on the country of origin. Almost one third (31 percent) would not support such a solution. On the other hand, 37 percent of respondents would want an obligation to sell to a foreign customer with an option to differentiate the terms (e.g. price) depending on the country of origin. **However, this solution has more opponents (41 percent).**

### SUMMARY

» **The form of geo-blocking which Poles are most likely to experience is no option for delivery of products or services to Poland - according to 48 percent of respondents. The second factor restricting options for making purchases is the cost of transport exceeding the value of the order, and the third is the inability to register with the store using a Polish address. Furthermore, one quarter of respondents (29 percent) declare that the product (or service) was different from the one shown on the sale page, and nearly the same number (26 percent) say that the price exceeded that available in Poland. 21 percent of respondents could not pay with a card issued in Poland and 19 percent had to pay a higher price when it came to payment than that advertised on the website. Interestingly, the products most often subject to geo-blocking include: clothing, cosmetics, furniture and toys, electronic equipment and non-digital services such as watching films online. According to respondents, everybody in the EU should be faced with similar terms when making purchases, (the price should be similar, delivery terms should be similar and the guarantee terms should be similar). With more complex solutions, half the respondents also see the need to protect the interests of the seller; however, these are less important than those of the consumer. Most would support changes to EU law that would deal with: price differentiation, the ability to register and making payments with a Polish bank card, and would also be in favour of introducing information on the fact that the customer will be re-directed to a different page when making payment.**

## 33 percent

"a business should have the right to refuse to sell to a foreign customer, but only on account of different legal and tax rules (e.g. higher taxes, different consumer protection law) in the customer's country of origin"

## 21 percent

"a business should not have the right to refuse to sell to a foreign customer, but may differentiate the offer (e.g. price, sale and delivery terms, guarantee service) on account of the customer's country of origin"

## 28 percent

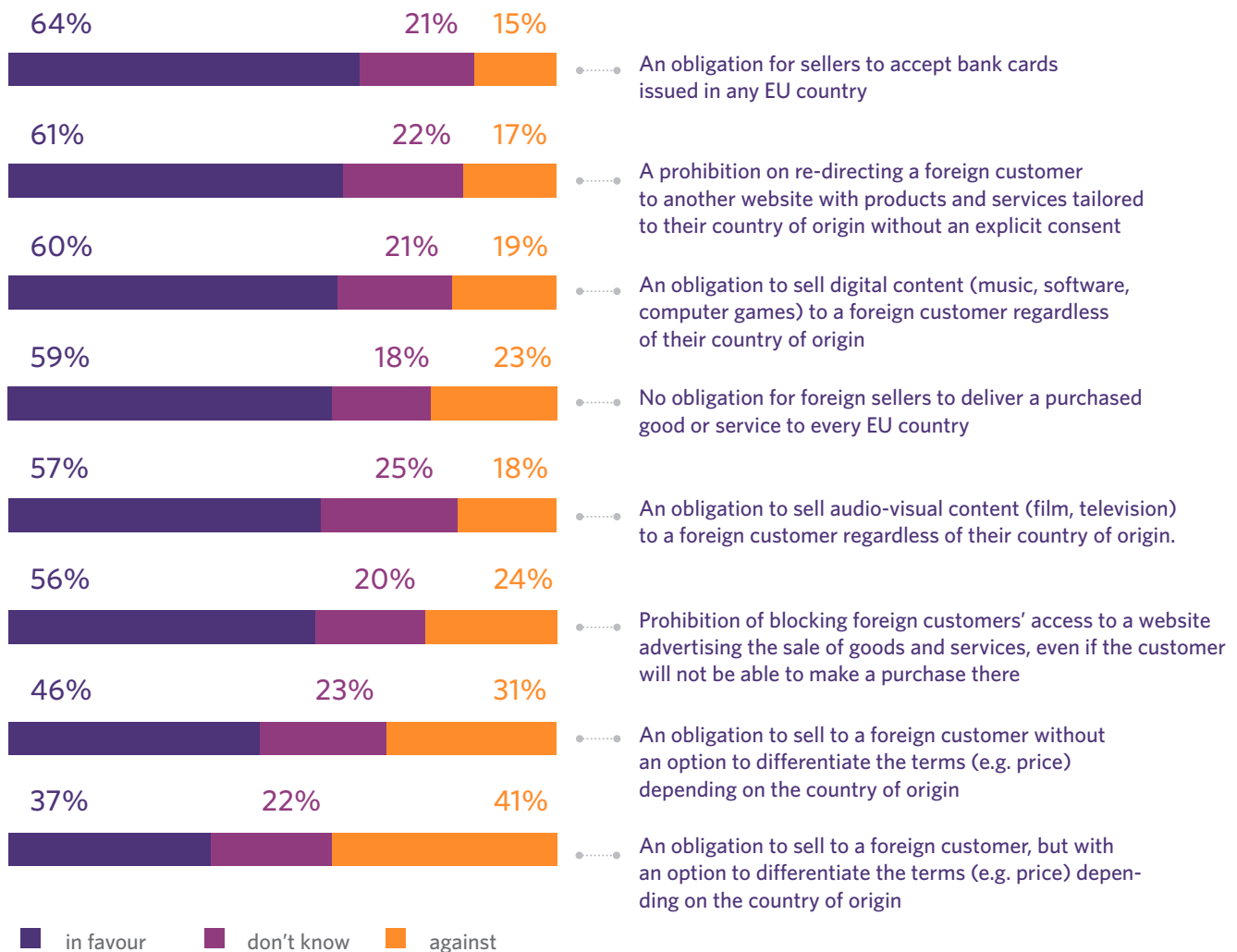
"a business should not have the right to refuse to sell to a foreign customer and may not differentiate the offer (e.g. price, sale and delivery terms, guarantee service) on account of the customer's country of origin"

## 18 percent

"a business should be free to refuse to sell to a foreign customer"

### CHART 7. POLES SUBJECT TO GEO-BLOCKING: WHAT LEGISLATIVE SOLUTIONS WOULD THEY SUPPORT?

Source: In-house materials based on IQS.



# Recommendations

1

**In the European Commission's draft regulation, it should be clarified which law applies to a business in terms of "passive sale".** Companies demand that the law in force in the business's country of origin/establishment should be applicable when resolving disputes with consumers. It should be noted that such a solution was supported by more than half of Polish respondents surveyed for Polityka Insight (59 percent). Thus, it seems that consumers are willing to accept regulations that could be less favourable for them.

2

**Expanding the scope of provisions in EU law to other goods and services, including content subject to copyright, should be considered.** Consumer organisations support this. While surveys conducted both for the EC as well as Polityka Insight show that digital content is not as popular subject of internet purchases as clothing or electronics and in purchasing it consumers are not faced with significant problems. At the same time, as many as 60 percent of respondents taking part in the survey for Polityka Insight are in favour of introducing an obligation in the EU to sell digital content to a foreign customer. The Commission excluded it from the scope of its draft regulation, as these are usually covered by copyrights which are of a territorial character and are governed by separate regulations. However, an introduction of a ban on geo-blocking content of this type in situations where it is solely based on the seller's business decision (when it restricts the offer to selected member states, despite owning a license to sell to the entire EU) could be considered.

3

**The ban on automatically re-directing customers to regional or national sites has to be upheld.** The Commission's research showed that this phenomenon is marginal; however, amongst those surveyed for Polityka Insight this is the second most popular legislative solution.

4

**Provisions on accepting online payments made with a foreign card should be kept.** The inability to use such a card is a serious obstacle for e-purchases. An obligation to accept cards issued in any member state is the most popular regulatory solution according to those surveyed for Polityka Insight.

5

**Geo-blocking should be considered separately from differentiating prices by e-shops in EU countries.** New regulations should not prohibit sales at different prices on different markets, e.g. Polish and German, but rather should stop a German customer in a Polish e-shop being charged more than a Pole in the same shop.

6

**The problem associated with the considerable cost of trans-border deliveries has to be resolved.** The courier market is not subject to the draft EC provisions, however high delivery prices effectively dissuade businesses from selling abroad and repel consumers - this obstacle to e-shopping was most often identified by Poles in the survey conducted for Polityka Insight.





# Bibliography

- BEUC, 2016, Position Paper on European Commission's proposal on geo-blocking. Download from: [http://www.beuc.eu/publications/beuc-x-2016-090\\_are\\_beuc\\_position\\_paper\\_geo-blocking.pdf](http://www.beuc.eu/publications/beuc-x-2016-090_are_beuc_position_paper_geo-blocking.pdf) (access: 18 November 2016).
- BSA, 2016, Seizing Opportunity Through License Compliance. BSA Global Software Survey. Download from: [http://global-study.bsa.org/2016/downloads/studies/BSA\\_GSS\\_US.pdf](http://global-study.bsa.org/2016/downloads/studies/BSA_GSS_US.pdf) (access: 30 November 2016).
- Business Europe, 2016, Comments on the geo-blocking proposal. Download from: <https://www.buinesseurope.eu/publications/comments-geo-blocking-proposal-business-Europe-position-paper> (access: 18 November 2016).
- Directorate-General for Communication, 2015, Flash Eurobarometer 397. Consumer attitudes towards cross-border trade and consumer protection. Download from: [https://data.europa.eu/euodp/pl/data/dataset/S2031\\_397\\_ENG](https://data.europa.eu/euodp/pl/data/dataset/S2031_397_ENG) (access: 18 November 2016).
- ComEur, 2015a, Identifying the main cross-border obstacles to the Digital Single Market and where they matter most. Download from: [http://ec.europa.eu/consumers/consumer\\_evidence/market\\_studies/obstacles\\_dsm/docs/21.09\\_dsm\\_fieport.pdf](http://ec.europa.eu/consumers/consumer_evidence/market_studies/obstacles_dsm/docs/21.09_dsm_fieport.pdf) (access: 18 November 2016).
- ComEur, 2015b, Proposal for a regulation on ensuring the cross-border portability of online content services in the internal market. Download from: <https://ec.europa.eu/digital-single-market/en/copyright> (access: 18 November 2016).
- ComEur, 2016a, Geoblocking. Glossary. Download from: <https://ec.europa.eu/digital-single-market/en/glossary/#-geoblocking> (access: 18 November 2016).
- ComEur, 2016b, Mystery Shopping Survey on Territorial Restrictions and Geo-blocking in the European DSM. Download from: [http://ec.europa.eu/consumers/consumer\\_evidence/market\\_studies/docs/geoblocking-exec-summary\\_en.pdf](http://ec.europa.eu/consumers/consumer_evidence/market_studies/docs/geoblocking-exec-summary_en.pdf) (access: 18 November 2016).
- ComEur, 2016c, Antitrust: Commission publishes initial finding geo-blocking from e-commerce sector inquiry – Fact-sheet. Download from: [http://europa.eu/rapid/press-release\\_MEMO-16-882\\_en.htm](http://europa.eu/rapid/press-release_MEMO-16-882_en.htm) (access: 18 November 2016).
- ComEur, 2016d, Impact Assessment accompanying the document proposal for a regulation of the European Parliament and of the Council on addressing geo-blocking and other forms of discrimination based on place of residence or establishment or nationality within the Single Market. Download from: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=SWD:2016:0173:FIN> (access: 18 November 2016).
- ComEur, 2016e, Summary of responses provided as part of European Commission's social consultations in 2015 on geo-blocking. Download from: <https://ec.europa.eu/digital-single-market/en/news/full-report-re-sults-public-consultation-geoblocking> (access: 18 November 2016).
- ComEur, 2016f, Draft resolution on addressing geo-blocking and other forms of discrimination based on place of residence or establishment or nationality within the Single Market and on amending Resolution (EC) 2006/2004 Directive 2009/22/EC. Download from: <https://ec.europa.eu/transparency/regdoc/rep/1/2016/PL/1-2016-289-PL-F1-1.PDF> (access: 18 November 2016).
- ComEur, 2016g, Proposal for a regulation laying on the exercise of copyright and related rights applicable to certain online transmissions of broadcasting organisations and retransmissions. Download from: <https://ec.europa.eu/digital-single-market/en/news/proposal-regulation-laying-down-rules-exercise-copyright-and-related-rights-applicable-certain> (access: 18 November 2016).
- Lewiatan Confederation, 2016, Position on geo-blocking. Download from: [http://konfederacjalewiatan.pl/legislacja/opinie/prawo-ue/1/projekt\\_w\\_sprawie\\_geoblokowania\\_powinien\\_zachecac\\_fi\\_y\\_do\\_ekspansji\\_zagranice](http://konfederacjalewiatan.pl/legislacja/opinie/prawo-ue/1/projekt_w_sprawie_geoblokowania_powinien_zachecac_fi_y_do_ekspansji_zagranice) (access: 18 November 2016).
- Pawlak M., 2016, Geo-blocking – no, differentiating prices – why not? Startup Poland. Download from: <http://startup-poland.org/geoblokowanie-nie-roznicowanie-cen-czemu-nie/> (access: 18 November 2016).
- Śledziewska K., A. Pacewicz, M. Sobolewski, B. Okoń, K. Gyódi, M. Ziemiński, 2016, Analysis of the geo-blocking mechanism in the context of differentiating trans-border electronic trade prices in the European Union. Polish Perspective. Download from: <http://www.delab.uw.edu.pl/portfolio-items/dr-hab-k-sledziewska-dr-a-pugacewiczdr-m-sobolewski-k-gyodi-b-okonm-zieminski-analiza-mechanizmu-geoblokowania-w-kontekście-roznicowania-cen-w-ue/> (access: 18 November 2016).







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