

Reference: 02127106

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

4 February 2026

## Freedom of Information request: Right to know request

Thank you for your request for information concerning data on VPN use.

We received this request on 7 January 2026 and we have considered your request under the Freedom of Information Act 2000 (the 'FOI Act').

### Your request

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*Copies of any factual datasets, aggregated statistics, or analytical outputs held by Ofcom relating to the use of VPN services by UK users that were obtained from, or derived from, Apptopia, SimilarWeb, or Ipsos Iris, and which were used or considered by Ofcom between 1st Jan 2025 and 1st Jan 2026*

### Our response

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We have not used any data from SimilarWeb or Ipsos Iris for VPN-related work, so we therefore do not hold the information requested.

Whilst we do hold information in scope of your request, concerning Apptopia, it is being withheld as we consider that its disclosure is exempt under section 43(2) of the FOI Act. This exemption deals with information that, if disclosed, would, or would be likely to, prejudice the commercial interests of a person or company. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. Annex A attached to this letter sets out the exemption in full, as well as the factors Ofcom considered when deciding where the public interest lay.

Yours sincerely,

## Information Requests

### Request an internal review

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

### Taking it further

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).

Annex

**Section 43(2) of the Act provides that:  
Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).**

Factors for disclosure	Factors for withholding
<ul style="list-style-type: none"> <li>• Ofcom recognises that its approach to its duties under the Online Safety Act 2023 is a matter of interest to the wider public. Releasing such information could be said to increase transparency in our work and allow for discussion in a public forum.</li> <li>• Enabling the public to gain a better understanding of the commercial relationships between Ofcom and its suppliers and the nature of the services provided, and thereby increasing public confidence in Ofcom’s work.</li> <li>• Generally, there is a public interest in transparency of expenditure, especially if public money is involved.</li> </ul>	<ul style="list-style-type: none"> <li>• Ofcom contracts with a variety of companies in order to support its operations and has ongoing financial relationships with many of them. Companies need to be confident that information relating to their business, such as information about them as an organisation or relating to the detail of their products or services, will not be disclosed if it would, or would be likely to, prejudice their commercial interests.</li> <li>• Ofcom continues to negotiate and require contracts like those related to this request. To release the specific information requested would put Ofcom in a detrimental position for future contract negotiations and would undermine its bargaining position with potential suppliers.</li> <li>• Ofcom engages with a number of individuals and has a financial relationship with them. Individuals contracting with Ofcom need to be confident that information relating to their services or rates will not be disclosed if it would, or would be likely to, prejudice their commercial interests.</li> <li>• The disclosure of a third-party vendor’s processing steps, data sources, algorithms could enable its competitors to gain an unfair advantage in the market. Additionally, disclosure of third-party vendor’s data protection/privacy impact assessment would contain information of processing systems, proprietary technologies and management strategies and decisions, which could place the third-party at a competitive disadvantage.</li> </ul>

### **Reasons why public interest favours withholding information**

- We consider that, on balance, the public interest in withholding disclosure of the requested information outweighs the public interest in disclosing the information.
- Ofcom enjoys a positive relationship with those companies and individuals it contracts with. The release of information which would, or would be likely to, prejudice commercial interests into the public domain would impair both Ofcom's relationship with providers of services, and adversely affect its commercial relationships with other contractors. If contractors could not be confident that such information provided by them to Ofcom would be withheld from disclosure, except in compelling circumstances, commercial activity may be impeded. These considerations go against the public interest in disclosing.
- Weighing the issues presented, it is considered that on balance, the factors for withholding the requested information outweigh those for disclosing the information.