

Reference: 02106983

Information Requests
information.requests@ofcom.org.uk

12 January 2026

Dear,

Freedom of Information request: Right to know request

Thank you for your request for information concerning VPN Tracking.

We received this request on 11 November 2025 and we have considered your request under the Freedom of Information Act 2000 (“the FOI Act”).

On 9 December 2025 we informed you that we needed to extend the time limit to respond to your request – we have now concluded our considerations.

Your request & our response

“I write under the Freedom of Information Act 2000 to request the following information:

1. The name of the third-party AI provider that Ofcom uses to gather data on UK VPN usage, as referenced in the article “Exclusive: Ofcom is monitoring VPNs following Online Safety Act. Here’s how” published by TechRadar on 10 November 2025.”

TechRadar

The name of the third-party provider used to gather data on daily users of VPNs is Apptopia.

2. A description of the types of data that the provider supplies to Ofcom (e.g., aggregate VPN app usage, device counts, geographic breakdowns, any personally identifiable information) and confirmation that no personally identifiable user-level data is accessed or used by Ofcom or the provider. The article quotes OFCOM:

We can confirm that the data we access and use in our analyses is fully aggregated at the app level, and no personally identifiable or user-level information is included. TechRadar

We have published information based on the data provided to us by Apptopia in our reports: [Online Safety in 2025: Summary of the technology sectors response to online safety rules](#) and [Online Nation report 2025](#).

As the UK’s online safety regulator, part of our role is to understand how people use the internet so we can ensure platforms are putting appropriate measures in place to protect UK users. The information we collect on VPN adoption is part of this work, and does not include any personal data, only aggregate data on market trends and traffic volume.

3. “The legal or contract basis under which Ofcom engages this provider (for example: framework

contract, procurement decision, data licence agreement) and the date when the contract commenced.”

This provider was engaged under a service contract. The contract commenced during the fourth quarter of 2023 and was renewed for the following year.

4. “The cost to Ofcom of engaging this provider in the most recent financial year.”

The total value of the contract for the third-party vendor Apptopia for the fourth quarter of 2023-2024 can be found online along with information regarding the contract as awarded:

<https://www.contractsfinder.service.gov.uk/notice/affd2903-bba4-42fa-a96a-f65e7ff23329>.

We are unable to provide the total expenditure for the last complete financial year, as we consider that this information is exempt from disclosure 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 any person including the public authority holding it. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. In this case, we consider that the public interest favours withholding the information. The attached **Annex A** 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

Annex A

**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"> • 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. • 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. • Generally, there is a public interest in transparency of expenditure, especially if public money is involved. 	<ul style="list-style-type: none"> • 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. • 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. In addition, to release the detailed amount Ofcom pays for a service could prejudice the commercial interests of the supplier – in that it would provide details of the supplier’s commercial relationships to its competitors or potential clients.
<p>Reasons why public interest favours withholding information</p>	

- 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. Similarly, Ofcom's bargaining position, and therefore ability to obtain value for money in services it contracts for, may be undermined in future negotiations if full details about the cost of these services were disclosed. 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.

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) 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](#).