

NOTICE OF COLLECTIVE PROCEEDINGS ORDER PURSUANT TO RULE 81 OF THE TRIBUNAL RULES

This is a legal notice that has been issued at the direction of the Competition Appeal Tribunal

If you are a consumer who between 8 November 2018 and 8 June 2026 obtained iCloud services for use on an iOS device, you could benefit from a claim

- A collective claim is being brought in the Competition Appeal Tribunal (the “**Tribunal**”) on behalf of all consumers who were **iOS Users**, at any time during the Claim Period, obtained **iCloud Services** on an **iOS Device** on which the United Kingdom was selected as the “Country/Region” in the **Apple ID** account settings (or Personal Representatives of such persons) (the “**Class**” or “**Class Member**”), save that any iOS Users who first obtained iCloud Services after 8 June 2026 are not Class Members.
 - “**iOS Users**” refers to all natural persons using iOS Devices;
 - “**Claims**” means the “standalone claims” under section 47A of the Act for loss and damage caused by breaches of statutory duty by the Proposed Defendants in particular by conduct concerning cloud storage for its mobile devices that these collective proceedings propose to combine;
 - “**Claim Period**” means between 8 November 2018 and the date of the Tribunal’s final determination of the Claims or their earlier settlement;
 - “**iOS Device**” refers to smart mobile devices (both phones and tablets) running on iOS including iPhones, iPads, iPod Touch and any other smart mobile device supplied by Apple that uses iOS as its operating system;
 - “**iCloud Services**” means the services of cloud storage and/or backup provided to consumers with iOS devices by Apple as part of Apple’s iCloud, iCloud+, and Apple One offerings (whether purchased or otherwise). iCloud Services include cloud storage services such as iCloud Drive, iCloud Photos, iCloud Backup;
 - “**Apple ID**” means the password protected account that gives access to Apple services, including iCloud Services; and
 - “**Personal Representatives**” includes all persons with a grant of representation or letters of administration, or executors of a testate estate.
- The Tribunal granted a Collective Proceeding Order (“**CPO**”) on 17 June 2026.
- All persons who fall within the definition of the Class and who were domiciled in the UK on 8 June 2026 are included in the Class unless they opt out.

- All persons who fall within the definition of the Class and but were **not** domiciled in the UK on 8 June 2026 are permitted to opt in to the proceedings.
- Class Members are being represented by the Consumers’ Association (“**Which?**”). Which? is the largest independent consumer organisation in the UK that advocates for UK consumers, and has more than 50 years of experience leading consumer campaigns and achieving change for UK consumers. Further information about the Class Representative is available on the claims website at www.cloudclaim.co.uk.
- The claim is against Apple Inc., Apple Distribution International Ltd, Apple Europe Limited and Apple Retail UK Limited (the “**Defendants**” or “**Apple**”) and alleges Apple has breached UK and EU competition law by abusing its dominant position. In summary, Which? says that Apple has abused its dominant position by favouring Apple’s own iCloud Services and steering consumers including by using prompts and the architecture of its operating system (iOS), toward iCloud by not clearly informing them of the existence of alternatives to that storage or how those alternatives could be used on their iOS Device. As a result, Which? alleges that the Class Members have suffered loss.
- Please read this notice carefully as your decision about this claim will have legal consequences To read the Tribunal's CPO and judgment which allows the claim to proceed, visit www.cloudclaim.co.uk or www.catribunal.org.uk.

Your Rights and Options at this Stage:

YOU MAY	LEGAL RIGHTS AND CHOICES EXPLAINED	DEADLINE
STAY IN THE CLAIM	Class Members domiciled in the UK are not required to do anything for the time being. If the claim results in a distribution to Class Members, it will be necessary for Class Members to identify themselves to the Class Representative and register their claim to a share of any damages which may be ordered. Class Members will be notified how they may do so at a later date.	
OPT OUT	If you fall within the definition of the Class and were domiciled in the UK on 8 June 2026, you are included in the Class unless you take steps to opt out. The deadline for opting out is 8 October 2026. Please see below for information on how to opt out.	8 October 2026
OPT IN	If you fall within the definition of the Class and were not domiciled in the UK on 8 June 2026, you are permitted to opt in to the proceedings. The deadline for opting in is 8 October 2026. Please see below for information on how to opt in.	8 October 2026

GENERAL INFORMATION

1. Why has this Notice been issued?

The Tribunal has directed that this notice be issued following the CPO made on 17 June 2026 in favour of Which?. The CPO allows this claim to proceed as a collective claim on behalf of Class Members. To read the full CPO and judgment, visit www.cloudclaim.co.uk or www.catribunal.org.uk.

This notice has been issued to inform you of important legal rights you have related to this claim.

Exercising these rights could affect your ability to get a payment in the future (if and when compensation becomes available). This notice explains the nature of the claim, who is covered by the claim, your rights in relation to the claim, how to exercise these rights and any related deadlines.

2. What are Collective Proceedings?

Collective proceedings are a method through which a single person or entity, known as a “class representative” may bring proceedings on behalf of a set of individual claimants who qualify as a “class”.

In the UK, the Consumer Rights Act 2015 introduced a collective action regime which makes it possible for collective proceedings to be brought in respect of alleged breaches of competition law. Under this Act, a class representative can pursue collective proceedings for an alleged infringement of competition law, bringing together individual claims that raise the same, similar or related issues of fact or law (“**common issues**”).

The first step in bringing collective proceedings is to apply for certification from the Tribunal. This is achieved by filing an application for a CPO.

Collective proceedings are categorised as “opt in” or “opt out”, according to the way in which members are admitted to the class. Opt-in proceedings require Class Members to sign up to participate in the claim, while out-out proceedings includes all individuals who falls within the class definition approved by the Tribunal. Those who prefer not to be included in the class can opt out. This claim is brought on an opt-out basis in respect of UK domiciled class members and an opt in basis in respect of those not domiciled in the UK.

3. Who is the claim against?

This claim is against Apple Inc., Apple Distribution International Ltd, Apple Europe Limited, and Apple Retail UK Limited (together, the “**Defendants**” or “**Apple**”).

The Defendants are members of the Apple corporate group. Apple is a US-based technology company which manufactures all iOS Devices, including smartphones and tablets.

4. What is the claim about?

The claim is a collective action against Apple, whom the Class Representative alleges has breached UK and EU competition law by abusing its dominant position. The Class Representative says that Apple has abused its dominant position by forcing customers to use iCloud by designating iCloud as the only way of storing or backing up certain files (“**Restricted Files**”). Apple has also steered consumers, including by using prompts and the architecture of its operating system (iOS), toward

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www.cloudclaim.co.uk

iCloud by not clearly informing them of the existence of alternatives to that storage or how those alternatives could be used on their iOS Device.

Together, this unlawful conduct locks users into Apple's iCloud storage services, prevents them from switching to alternative cloud providers, excludes competitors or would-be competitors, and enables Apple to charge higher fees for iCloud services, than would be the case if Apple behaved lawfully. As a result, the Class Representative alleges that members of the Proposed Class have suffered loss. Which? is also seeking an injunction, requiring Apple to end the unlawful practices going forwards.

The claim involves a number of issues common to the class members. The common issues which can suitably be determined on a collective basis in the Collective Proceedings include:

- Does the Tribunal have jurisdiction to hear the claims made in the Collective Proceedings?
- What is/are the relevant substantive law(s) applicable to the claims?
- What is the appropriate market definition applicable to the claims in the Collective Proceedings?
- Did the Defendants occupy a dominant position in any relevant market during the Relevant Period?
- Did the conduct of the Defendants amount to abuse of their dominant position affecting trade within the UK (and/or between the UK and EU up until 31 December 2020), contrary to UK and EU competition law?
- Did Apple's abuse of its dominant position cause or materially contribute to loss suffered by the Class?
- What is the total award of aggregate damages for the Class?
- What is the level of interest to be awarded on any damages awarded to the Class?
- On what basis should that interest be awarded to the Class?

5. Who is the Class Representative?

The Class Representative is Which?, the UK's largest independent, non-profit consumer advocacy organisation. Which? has been championing consumers' rights for more than 60 years by testing products, publishing product reviews and pushing companies to improve their standards and practices. Which? represents consumer interests in court through representing consumers in collective proceedings, which is what it is doing in this case. Which? has more than 1.5 million members and supporters across the UK and provides members with legal, financial advice and technical assistance in the digital space.

Which? will conduct the claim against Apple on behalf of all members of the Class (except for those who opt-out of the class). Which? will instruct the lawyers and experts, make decisions on the conduct of the proceedings and, in particular, will decide whether to accept any settlement offer that Apple may make and present it to the Tribunal for its approval.

During the proceedings, Which? is responsible for communicating with the Class and for issuing formal notices, such as this notice. Which? will put updates about the proceedings on the website (www.cloudclaim.co.uk) and through print, online and social media.

6. Who is the class in this claim?

The Class consists of all **iOS Users** who, at any time during the Claim Period, obtained **iCloud Services** on an **iOS Device** on which the United Kingdom was selected as the “Country/Region” in the **Apple ID** account settings (or the Personal Representatives of such persons), save that any iOS Users who first obtained iCloud Services after 8 June 2026 are not Class Members.

“**iOS User**” refers to all natural persons using iOS Devices;

“**Claims**” means the “standalone claims” under section 47A of the Act for loss and damage caused by breaches of statutory duty by the Proposed Defendants in particular by conduct concerning cloud storage for its mobile devices that these collective proceedings propose to combine;

“**Claim Period**” means between 8 November 2018 and the date of the Tribunal’s final determination of the Claims or their earlier settlement;

“**iOS Device**” refers to smart mobile devices (both phones and tablets) running on iOS including iPhones, iPads, iPod Touch and any other smart mobile device supplied by Apple that uses iOS as its operating system;

“**iCloud Services**” means the services of cloud storage and/or backup provided to consumers with iOS devices by Apple as part of Apple’s iCloud, iCloud+, and Apple One offerings (whether purchased or otherwise). iCloud Services include cloud storage services such as iCloud Drive, iCloud Photos, iCloud Backup;

“**Apple ID**” means the password protected account that gives access to Apple services, including iCloud Services; and

“**Personal Representatives**” means all persons with a grant of representation or letters of administration, or executors of a testate estate.

Those who fall within this class definition and who were domiciled in the UK on 8 June 2026 are included in the Class unless they opt out. Those who fall within this class definition but were domiciled outside the UK on 8 June 2026 and wish to participate in the claim will have the opportunity to opt in to the claim.

7. Who is excluded from the class?

The following categories of individuals and corporates are excluded from the Class:

- (1) Officers, directors or employees of the Proposed Defendants, their subsidiaries and any entity in which they have a controlling interest.
- (2) All members of the Class Representative’s and Proposed Defendants’ respective legal teams and all experts and professional advisers instructed and retained by them and all funders or insurers involved, in connection with the proceedings.
- (3) All members and staff of the Tribunal assigned at any point to the proceedings.
- (4) Any judge or Court staff involved in any appeal and/or judicial review in the proceedings (whether in respect of the grant of permission to appeal/judicial review or the hearing of any substantive appeal/judicial review).

HOW TO OPT OUT

8. How can a Class Member opt out of the claim?

If you wish to opt out of the claim, you can do so by completing an opt-out form which can be found on the claim website at www.cloudclaim.co.uk, or email optout@CloudClaim.co.uk, or send a letter to:

Cloud Claim
P.O Box 1435
Sunderland, SR5 9UD

If opting out by way of an email or a letter, please include the following statement “**I, [insert name of person] want to opt out of the UK collective claim against Apple, Case No. 1689/7/7/24,**” along with your postal address, email address and telephone number. If you are doing this by way of a letter, you will need to sign and date your opt-out letter. You do not have to give any reason for opting out.

An example opt-out form is available for download at www.cloudclaim.co.uk.

To be considered, your opt-out request must be received or postmarked by **8 October 2026**. Once the opt-out form, email or letter is received and processed, we will send you an acknowledgement by email if you have provided an email address, or by post if not.

By opting out, you will not be able to claim a share of any compensation that becomes available. However, you may be able to bring your own separate claim against Apple in relation to the same issues within the applicable statutory limitation period.

HOW TO OPT IN

9. How can a Class Member opt in to the claim?

If you fall within the definition of the Class but were not living in the UK as at 8 June 2026, you must take steps to opt in to the class to be part of the claim and be eligible to receive a payment in the future.

You can opt in by visiting www.cloudclaim.co.uk and completing the opt-in form on the website. You will need to provide your full business name or full name or company name (including companies house number), postal address, email address and telephone number. You can also submit the opt-in form by email at info@CloudClaim.co.uk.

If you prefer, you may opt in by post. Send a letter with the information listed in the previous paragraph. An example opt-in form is available at www.cloudclaim.co.uk to download. If you would like to be sent a SAE to submit your opt-in letter, please send an email with your postal address to info@CloudClaim.co.uk.

Send your opt-in letter to:

Cloud Claim
P.O. Box 1435
Sunderland SR5 9UD

To be considered, the opt-in request must be received or postmarked by 8 October 2026. Once the opt-in request is received and processed, we will send you an acknowledgement by email if you have provided an email address, or by post if not.

GETTING MORE INFORMATION

9. What is the Competition Appeal Tribunal?

The Tribunal is a specialist court based in London that covers the whole of the UK and hears competition law disputes. The Tribunal publishes its Rules and Guidance, together with information about what it does, on its website <http://www.catribunal.org.uk>.

10. How can I stay updated on the progress of the claim?

You can visit www.cloudclaim.co.uk for updates and to register your interest.

This notice summarises the CPO granted by the Tribunal. To read other information about the claim, visit www.cloudclaim.co.uk. You may also read more about this case at the Tribunal's website at www.catribunal.org.uk.