



The Competition Law Firm



Data Pooling: Learning Where to Draw the Line?

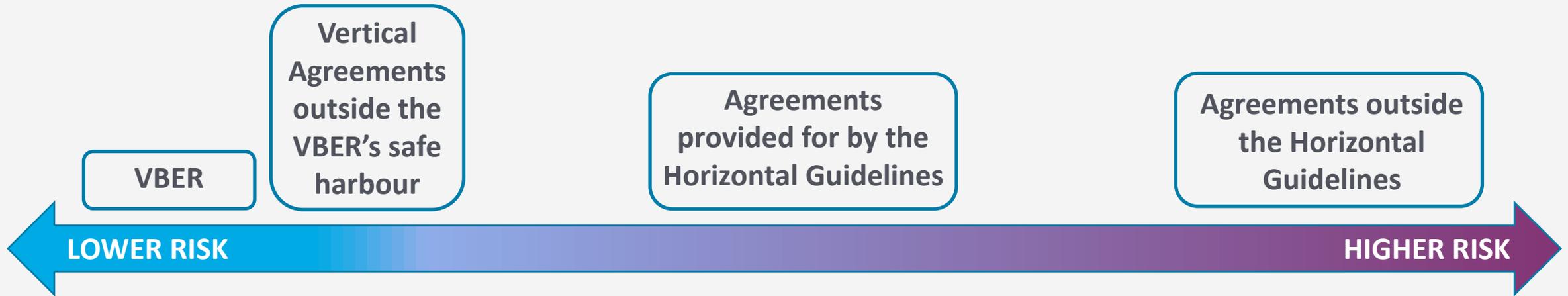
BIG DATA AND COMPETITION LAW

15 October, 2019

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INFORMATION SHARING RISK IN DATA POOLING



- Information exchanges between non-competitors.

- Exchanges of non-commercially sensitive information between competitors e.g. historic or public (paras 90 and 92)
- Exchanges of potentially sensitive data that has been anonymized and/or aggregated. (para 89)
- Indirect exchanges for a lawful objective between competitors with low market share (e.g. JPAs, paras 203 and 224).

- Exchanges between competitors of commercially sensitive information which has **not** been aggregated and/or anonymized.