



¹ The Act does not explain how many UK users is considered "significant". Ofcom says that you should be able to explain your judgement on this point, especially if you think you do not have a significant number of UK users. Ofcom does confirm that UK users can be individuals or entities. For the purpose of counting UK users, you do not need to include any of your own employees. You should count only those users who have actually engaged with the service. For a search service this would be such users who have submitted a search query.

² The Act does not explain what a "target market" is. Ofcom says that the UK is likely to be a target market if you direct your service towards UK users in the way you design your service, promote your service or receive revenue from your service.

³ The service is capable of being used in the UK and there are reasonable grounds to believe there is a material risk of significant harm to UK individuals due to the content on the service. Limited further guidance has been provided on this prong of the "UK links" test but it is designed to catch services not caught by the other parts of the test and so should be interpreted broadly.

⁴ Services with limited functionality include services which only allow the sharing of comments or reviews on a platform e.g., newspaper comments sections or product review sections.