

Unclassified

English - Or. English

15 May 2023

Directorate for Financial and Enterprise Affairs
COMPETITION COMMITTEE

Annual Report on Competition Policy Developments in Denmark

-- 2022 --

This report is submitted by Denmark to the Competition Committee FOR INFORMATION.

JT03518918

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Denmark

1. Changes to competition laws and policies, proposed or adopted

1.1. Summary of new legal provisions of competition law and related legislation

✚ No new relevant legal provisions were presented in 2022.

1.2. Other relevant measures, including new guidelines

2. In 2022, the DCCA published three sets of guidelines on Competition Law and one set of guidelines on the Danish Payment Act.

3. In January, the DCCA published revised guidelines on unannounced inspections (Dawn Raids). The guidelines explain the purpose of a dawn raid and give guidance to Companies subject to dawn raids, e.g. how dawn raids are conducted, right for Companies subject to a dawn raid, and how the DCCA secure data and subsequent searches in such data seized by the DCCA. Guidance is also provided on the DCCA's powers to search private homes.

4. In January, the DCCA also published revised guidelines on leniency. The guidelines are aimed at both companies and individuals, and explain how leniency can lead to a partial or total reduction in sanctions (both fines or imprisonment) for participants in a cartel.

5. In May, the DCCA published revised guidelines on the procedures in cases being investigated by the DCCA. The guidelines describe the process from initial screening of a case until a final decision is made and further describes potential litigation before the Courts. In the guidelines it is explained that competition-cases are lengthy cases and provide advice on how to best conduct dialogue with the DCCA in order to optimize and potentially shorten the investigation. The guidelines also provide information on how a case can be concluded with the acceptance of a fine or binding commitments.

6. In the autumn of 2022, the DCCA published revised guidelines on payee surcharging of fees for payers use of payment methods in regard of the Danish Payment Act paragraph 121 (3)¹. In addition to describing when payees are permitted to surcharge, the guidelines also emphasize that a payee can offer payers a discount for the use of a payee preferred mean of payment.

7. The revised guidelines introduced a new chapter, in which the DCCA emphasizes that payees should always be compliant with the Danish Payment Act and thus not charge illegal fees. The Payees cannot point to either faulted equipment, software or their service providers in case an illegal fee has been charged. A new section on "Buy Now Pay Later" was also included in the revised guidelines.

¹ The Danish implementation of the Payment Service Directive article 62 (4)

2. Enforcement of competition laws and policies

2.1. Action against anticompetitive practices, including agreements and abuses of dominant positions

2.1.1. Summary of significant cases before the Danish Competition Council

The Danish Association of Peugeot Dealer's collective boycott of bilbasen.dk

8. In February 2022, the Danish Competition Council (“DCC”) decided that the association of car dealers of the Brand Peugeot, Peugeot Forhandler Foreningen (“PFF”) had infringed Section 6 of the Danish Competition Act and TFEU Article 101(1), because PFF decided to collectively boycott the digital market place for advertising of cars, bilbasen.dk, in order to promote the competitor, biltorvet.dk.

9. Documents from a dawn raid conducted in April 2018 revealed e-mail correspondence between individual car dealers of the brand Peugeot and board members of PFF as well as between board members of PFF. The e-mail correspondence demonstrated that independent car dealers of the brand Peugeot should refrain from advertising on bilbasen.dk and instead advertise on biltorvet.dk.

10. The DCC found that the aim of the collective boycott was to limit competition on the Danish market for digital marketplaces for advertisement of cars. As part of this, the aim of the collective boycott was to limit competition on the Danish market for the sale of used cars.

11. The collective boycott may have had a harmful effect on both consumers (potential buyers of cars on bilbasen.dk) and car sellers advertising on bilbasen.dk. Network effects within the Danish market for digital marketplaces for advertisement of cars may have increased the harmful effects of the collective boycott.

12. The DCC found that the decision within PFF had not given rise to procompetitive effects.

13. The DCC also found that the conditions for an exemption according to Section 8(1) in the Danish Competition Act and TFEU art. 101(3) were not fulfilled.

Prohibition against customer-allocation agreement

14. On 26 October 2022 the Danish Competition Council issued a prohibition decision as two companies had infringed section 6 of the Danish competition act by way of allocating customers between themselves in the markets of barcode scanners and data capture in Denmark.

15. The two Danish companies had agreed to divide customers between them and to avoid any direct or indirect contact to each other's customers for a period of more than three years.

16. The case concerned two customer allocation agreements. The first agreement was made as a “non-solicitation agreement” between two shareholders, shareholder A and B, in a jointly owned company. The purpose of the agreement was to divide the customers internally in the jointly owned company to avoid dispute between the shareholder A and B. As a part of the agreement, shareholder A and B created lists of which customers belonged to which shareholder.

17. Approximately six months after entering into the customer allocation agreement, shareholder A created a new company, which was active in the same market as the jointly

owned company. A year hereafter the jointly owned company went bankrupt and shareholder B created a new company, which competed with shareholder A's company. Despite the fact that the jointly owned company no longer was operating, shareholder A and B continued to comply with the customer allocation agreement. The shareholders competing companies were therefore not allowed to be in any contact with customers that appeared on the other shareholders list of customers.

18. However, shareholder A and B disagreed on the contents of the lists of which customers belonged to which shareholder. Therefore, the shareholders entered into a second agreement with the same content and purpose as the first agreement, but the lists of customers were reviewed and changes were made.

19. The case is not on appeal and is now pending the issuing of a fine from the Danish commercial and maritime court.

Market sharing by assigning exclusive marketing areas to members of association of undertakings

20. On June 22, 2022 the Danish Competition Council (DCC) adopted a decision concerning Boligtæxtilbranchens Indkøbsservice A.M.B.A. (Botex).

21. Botex is a Danish association of undertakings, which on behalf of its members negotiates agreements with suppliers of home textiles. Botex also sells home textiles directly to retail customers via an online shop and distributes products under the Botex-label to its members. The members of Botex are individual Danish retailers of home textiles. The members own brick-and-mortar stores in Denmark. The members of Botex each own a share in Botex.

22. In Botex' inter-trade covenant it was decided that the individual members were not allowed to distribute door-to-door campaigns/advertising material in another members' marketing area. Marketing areas were defined by postal codes.

23. The DCC found that Botex had adopted a decision on market sharing by assigning exclusive marketing areas to the members of the association. The DCC found that this decision constituted an infringement of Section 6, Subsection 1, of the Danish Competition Act and TFEU Article 101(1). The DCC ordered Botex to cease the illegal behavior and to refrain from similar activities in the future.

24. Subsequently, the DCC's decision was appealed to the Danish Competition Appeal Tribunal (DCAT). The case is still pending.

Partial, temporary suspension of the commitments regarding Association of Danish League Clubs' (ADLC) Joint Sale of Media Rights

25. In 2007 the DCCA adopted a decision concerning ADLC's joint sale of media right, where ADLC offered commitments which addressed the competition concerns of the Danish Competition Council, namely that the joint sale restricts competition between suppliers of media rights to the Superliga. The commitments have been revised in 2014.

26. Market developments on the TV markets has led the Competition Council to accept a partial, temporary suspension of the current commitments from 2014. The Danish Competition Council has concluded that there have been developments in relation to (i) the emergence of streaming services, (ii) consumers' free choice of distributor, and (iii) consumers choice of tv channels in their tv packages.

27. The Danish Competition Council does however still have some concerns regarding a potential price increase for the broadcasters, distributors as well as the consumers, and a

concern as to how the competition between the broadcasters and the distributors would be affected if the commitments were permanently repealed.

28. Therefore, the Danish Competition Council has granted a partial, temporary suspension of the current commitments. It is emphasized that the assessment of the commitments has been made in light of the particular circumstances on the relevant Danish media rights and TV markets.

29. The partial, temporary suspension includes a suspension of the “no single buyer”-rule. Under the current commitments, the rule determines that the media rights are sold in packages to multiple bidders, thereby prohibiting exclusivity. During the partial, temporary suspension, it will be possible for one broadcaster, streaming service or distributor to acquire the media rights to the Superliga exclusively.

30. The partial, temporary suspension also includes a simplification the current tender conditions. The Danish Competition Council finds it sufficient that a trustee will ensure that the media rights is sold in an open tender on equal, transparent and non-discriminatory terms.

31. The partial, temporary suspension will be valid for a period of four years and will apply to the forthcoming tender for the media rights. The forthcoming tender is set to take place in 2023/2024 with effect for the Superliga season starting in 2024.

32. The partial, temporary suspension also includes an evaluation of the forthcoming tender conducted under the terms of the suspension. The Danish Competition and Consumer Authority will make an assessment of how the suspension has affected price, competition between the broadcasters and distributors, and ultimately the consumer.

Personal-training cartel

33. Towards the end of 2022 DCC exercised its jurisdiction to settle a case with a fine notice in a case involving 12 personal-training course providers, called “Nye Visioner”. The case concerned pricing agreements and customer sharing under a shared business concept, regarding personal planning and efficiency, meeting management, stress prevention and management training. The developer of the concept ‘Nye Visioner’ – in return for a commission – made the concept available to a number of companies which in turn became partners in ‘Nye Visioner’. The involved parties accepted fines ranging from 10,000 – 90,000 DKK. All fines were capped, as a fine can only amount to 10 pct. of a company’s net Turnover. By the end of 2022 more cases in the case-complex was still underway.

Re-sale price maintenance by design company

34. A Danish design Company, Rosendahl Design Group, admitted infringements of the Danish Competition Act and accepted a fine of 7.5M DKK. The infringement consisted in Rosendahl having made its retailers only resell at the suggested retail prices. Furthermore, Rosendahl had prevented retailers from passive sales of Rosendahl’s products. The infringement took place between 2017 and 2021.

Re-sale price maintenance by baby-products supplier

35. A Danish branch of a Norwegian company, HTS Besafe”, that produce baby and children’s products, have admitted an infringement of the Danish Competition Act and accepted a fine of 8M. DKK. HTS had made its retailers keep the suggested retail prices and had further banned online-sales of certain HTS products. The infringement took place between 2015 and 2020.

2.1.2. Summary of significant cases before the Danish Competition Appeal Tribunal

36. No significant cases were decided by the Danish Competition Appeal Tribunal in 2022.

2.1.3. Summary of significant cases before the Danish Courts

37. No significant cases regarding Competition Law were decided by Danish Courts in 2022.

2.1.4. Sentences and settlements

38. In 2022, 14 undertakings were fined. The fines amounted to a total of DKK 32,413,000.

39. 12 fines were issued in accordance with a settlement procedure. The 12 fines related to 4 cases (3 cases each with 1 fine, and 1 case with 9 fines).

40. Three (3) individuals were also fined in 2022. The personal fines amounted to a total of DKK 275,000.

2.2. Mergers and acquisitions

2.2.1. Statistics on number, size and type of mergers notified and/or controlled under competition laws

41. In 2022, the DCCA approved a total of 72 notified mergers. 63 of the mergers were processed under the simplified procedure. Of the remaining mergers, 4 were approved in phase I and 5 were approved in phase II. 2 mergers were approved with commitments offered by the merging parties – both in phase II.

2.2.2. Summary of significant cases

Norlys Tele Service's acquisition of Verdo Tele

42. On 25 May 2022 the Danish Competition Council (DCC) approved Norlys Tele Service A/S' (Norlys) acquisition of sole control over Verdo Tele A/S (Verdo) subject to remedies.

43. Norlys, a part of the Norlys Group, owns optical fiber infrastructure – mainly in Jutland. Norlys provides internet access to retail suppliers of broadband connections and TV services ("service providers"), including Norlys Group's own retail supplier, Stofa A/S ("Stofa"), through the Norlys Group's subsidiary OpenNet A/S ("OpenNet").

44. Verdo is a subsidiary of Verdo a.m.b.a. (75 %) and Norlys (25 %). Verdo owns optical fiber infrastructure in the area in and around the Danish cities Randers and Hobro. Prior to the merger, Verdo entered into a service provider agreement with Stofa, and Stofa has so far been the sole service provider using Verdo's infrastructure.

45. In December 2020, Verdo entered into an agreement with OpenNet in order to provide other service providers access to Verdo's infrastructure. In 2021, Verdo initiated negotiations with two service providers on terms and prices for access to Verdo's infrastructure.

46. The DCCA considered that the merger entails a risk of enabling Norlys to foreclose input (access) to the downstream market. Input foreclosure only entails restrictions on

competition if the input is significant for the product concerned on the downstream market. This is the case due to the fact that service providers are not able to supply broadband connections in the retail market without internet access at the wholesale level, there are no real alternatives to Verdo's infrastructure and finally there are significant barriers to entry to the wholesale market.

47. The DCCA also considered that Norlys would have an incentive to raise prices for competing service providers, who wanted access to Verdo's infrastructure, as Norlys then would be able to shield the Norlys Group-subsidiary Stofa from the competition from other service providers.

48. The DCCA found that input foreclosure would significantly impede effective competition on the markets for retail provision of TV services and fixed broadband connections. Based on an overall assessment the DCCA concluded that the merger would give rise to unilateral, vertical effects on the market for wholesale of internet access in the area of Verdo's infrastructure.

49. To address the DCCA's concerns for unilateral, vertical effects, Norlys offered commitments. Norlys offered to ensure that service providers, who wants access to Verdo's infrastructure will be granted access on equal terms compared to the Norlys-Group-subsidiary, Stofa. Furthermore, Norlys committed to offer all interested service providers the same wholesale and campaign prices that Verdo had already negotiated with the two third party service providers up to three years after the DCC's decision.

50. The DCC assessed that the remedies offered were sufficient to address the unilateral effects identified by the DCCA.

Knorr-Bremse's acquisition of DSB Component Workshop

51. On 22 June 2022 the DCC approved Knorr-Bremse Systeme für Schienenfahrzeuge GmbH's (Knorr-Bremse) acquisition of sole control over Selskabet af 3. juli 2021 ApS (DSB Component Workshop) subject to commitments.

52. Knorr-Bremse is a German manufacturer of equipment and components for trucks and trains. In Denmark, Knorr-Bremse sells components and spare parts in the independent aftermarket for Knorr-Bremse systems within brakes, doors and air conditioning for trains. Furthermore, Knorr-Bremse provides heavy maintenance on its own components. Knorr-Bremse's largest customer in Denmark is DSB Vedligehold A/S, including DSB Component Workshop.

53. DSB Component Workshop provides heavy maintenance of trains and, to a lesser extent, supplies its customers with spare parts. The main customer of DSB Component Workshop is DSB, but DSB Component Workshop also serves some external customers, mainly in Denmark.

54. Based on an overall assessment the DCC considered that the merger would lead to a significant impediment to effective competition due to the vertical relationship between the merging parties in the market for manufacturing and sale of spare parts for trains and the market for heavy maintenance of trains. After the merger Knorr-Bremse will become vertically integrated, which would give Knorr-Bremse the opportunity and incentive to raise prices or degrade conditions for smaller, Danish companies that need spare parts.

55. To address the concerns of the DCC, Knorr-Bremse has submitted four commitments. Overall, the commitments ensure that Knorr-Bremse continues to supply spare parts to current and future smaller, Danish customers at fair, reasonable and non-discriminatory prices and terms 10 years after the merger.

3. The role of competition authorities in the formulation and implementation of other policies, e.g. regulatory reform, trade and industrial policies

3.1. Advocacy

56. The DCCA's mission is to support well-functioning markets. One of the tools to achieve this goal is advocacy.

57. In August 2022, The DCCA published an analysis on competition in the Danish retail banking market. The analysis was commissioned by the Danish minister for Industry, Business and Financial Affairs. In the analysis it is concluded, that competition in the Danish retail banking market can be improved.

58. Further the DCCA has in 2022 been working on two market studies in the market for insurance and the market for charging of electronic vehicles. Both these studies are expected to be published in 2023.

59. In November 2022 the DCC held its annual conference on competition and regulation. At this year's conference the Keynote speaker was Fiona Scott Morton. Further the conference had three parallel sessions regarding, the pharmacy sector, pricing algorithms and competition, productivity and inflation.

3.1.1. Payments in Denmark report

60. In the summer of 2022, the DCCA published a report about Payments in Denmark, as the DCCA does every other year. The report gives an overview of the payment network and the regulation of it. It explains the activities of the DCCA since 2020 and lastly describes the main results from the DCCA's consumer survey about the consumers' choice of payment method in online and physical stores. The report also included statistics about payments in Denmark, as an annex.

3.1.2. Mortgage loans analysis

61. In 2017, an agreement between political parties stipulated that the DCCA each year should publish an analysis on the visibility and mobility in the Danish mortgage market. In February 2023, the DCCA published its fourth report of the market development of mortgage loans in Denmark. Among other things, this report showed that the prices for mortgage loans are generally stable, but at a high level. It also showed that mortgage banks earnings were relatively high in 2021.

62. The report from February 2023 included data from 2021. The report assesses that the mortgage banks already meet the future capital requirements, which are expected to be implemented in EU through 2032 in continuation of the EU Commission's proposal in October 2021 for the implementation of the Basel IV recommendations.

3.2. Communication and knowledge

3.2.1. Press releases, general communication and social media

63. In 2022, the DCCA sent out 45 press releases and 5 opinion pieces regarding competition law, public procurement and other cases related to competition.

64. The DCCA appeared daily in the media in the form of articles and interviews.

65. In addition, the DCCA has continuously communicated on Twitter and LinkedIn, including posts about the DCCA's results and knowledge as well as conferences that the DCCA has hosted or attended.

66. In June 2022, the Competition Council for the first time ever published its annual report 2021. The report describes the Competition Council's tasks and framework, and contains chapters on the coming year, the previous year and the resources of the Danish competition authorities.

67. Since 2017, the DCCA produced the podcast "Well-functioning markets". In 2022, the DCCA published 4 editorial episodes about public procurement, dawn raids, consumers in subscription markets, and the role of the DCCA in a tech age. 11 episodes with presentations from the conference "Well-functioning markets" and 7 episodes with DCCA-articles.

68. In June 2022, the DCCA organized and hosted the *ad hoc* conference "New frameworks for digital markets". Representatives from the DCCA presented the then-forthcoming EU regulations *Digital Markets Act* and *Digital Services Act* and invited guest speakers from the Danish and international business community shared their perspectives on how best to regulate tech.

3.2.2. Articles and publications

69. In 2022, the DCCA published 10 articles.

Advertisement on online search engines

70. Seven out of ten Danish companies that advertise via Google search choose to advertise on searches for their own company name, so-called self-advertising. In this article it is shown, among other things, that Danish companies' expenses for self-advertisement on Google's search engine mainly lead to the free clicks - that the company would have received without any ads - being converted into paid ad clicks.

Consumers and online search advertisement

71. In online search the DCCA investigated how the number of advertisements and how well they are marked affect consumers. The analysis indicates that well over half of consumers actively seek to avoid clicking on ads. At the same time, less obvious ad markings lead to more consumers clicking on ads. Less clear markings thus result in a loss of time for consumers and higher advertising costs for companies.

Disclosures on online marketplaces

72. Clear and intuitive disclosure of consumer information benefit consumers on online marketplaces. A new EU Directive increases the transparency of online marketplaces by requiring the clear disclosure of a range of important consumer information. The clarity, and thus effectiveness, of online disclosures can vary significantly depending on the presentation of the information, as demonstrated by the study in this article concerning paid rankings.

Collusion detection in public procurement

73. This article describes a new screening tool for identifying collusion and cartels in public tenders. The DCCA has developed and implemented computational methods to identify suspicious bidding in public procurement. The tool is intended to complement

traditional investigative methods and can be used to flag tenders and companies for additional scrutiny.

Competition in the pharmacy sector

74. Two articles. In Marts 2022 an article with an analysis of competition in the pharmacy sector. And in September 2022 an article that presents recommendations from The Danish Competition Council to strengthen competition in the pharmacy sector while still ensuring that citizens throughout Denmark must continue to have easy and safe access to medicines. The recommendations include measures aimed at strengthening competition in the pharmacy sector through structural interventions and ensuring lower prices for medicines for medicine users.

Vertical block exemption regulation

75. This article describes the main changes and clarifications resulting from revision of the EU block exemption regulation on vertical agreements. The article is aimed at practitioners with prior knowledge of the rules on vertical agreements.

Competition, prosperity and wealth/income differences

76. Initiatives to strengthen competition on the product markets can reduce wealth and income differences in Denmark. The article describes three analyses, which quantify in different ways the effect of increased competition on distribution and prosperity in Denmark.

Voluntary chains and competition law

77. In a voluntary retail-chain of companies, there is cooperation between independent retailers, which are typically competitors. According to competition law and as a main rule, the businesses in a voluntary chain must independently determine significant competition parameters, such as price. The DCCA had conducted a so-called web-scraping which inter alia showed that individual retailers that are members of a voluntary chain with individual websites often apply the same prices.

Regulation of a sector with monopolies

78. The economic regulation of the Danish drinking water utilities carried out by the DCCA has ensured lower water prices for consumers. This is shown by an analysis of the development in prices in over 300 drinking water utilities.

Inactive consumers in subscription markets

79. An increasing number of products are sold through subscriptions. In this study we find a high degree of consumer inactivity in subscription markets. A natural experiment suggests that when consumers are prompted to actively restart a subscription (due to payment card rejections) the number of consumers who decide to cease their subscriptions increases by 70 percent. National consumer surveys confirm that a substantial minority of consumers are passively maintaining subscriptions they no longer use or value.

Integrated modules on general online search engines

80. In June 2022, the DCCA published the first in a trilogy of articles regarding general online search engines (the latter two were published in March 2023). The article focuses on the impact of integrated modules in the search result page – whereby the search engine

directly displays answers to the search query, such as weather information, exchange rates, shopping opportunities or restaurants-in-the-area, in addition to web page link results – on web traffic to third-party websites.

81. The article is based on a controlled in-house user experiment as well as actual web traffic data provided to the DCCA by Google and Microsoft. We find that a significant share of users chooses to use the module search results when available, but the analysis is inconclusive with regards to the impact on web traffic to third-party websites.

4. Resources of competition authorities

4.1. Resources overall (current numbers and change over previous year):

4.1.1. Annual budget (in your currency and USD):

82. Estimated DKK 95.4 m. / USD 14.05 m.

4.1.2. Number of employees (person-years):

- economists; 36
- lawyers; 57
- other professionals; 10
- support staff; 8
- all staff combined; 111

4.2. Human resources (person-years) applied to:

- Enforcement against anticompetitive practices; 55
- Merger review and enforcement; 18
- Advocacy efforts; 30

83. Note: Support staff not included.

4.3. Period covered by the above information:

84. 2022

5. Summaries of or references to new reports and studies on competition policy issues

85. In August 2022, The DCCA published a report on competition in the Danish retail banking market. The analysis was commissioned by the Danish minister for Industry, Business and Financial Affairs.

86. In the analysis it is concluded, that competition in the Danish retail banking market can be improved. The banks are an important and, in many cases, the primary channel when private customers get advice on and buy a number of central financial services. More than 90 percent of private customers have a bank that offers both mortgage credit, insurance, pension schemes and investment funds via an intermediary agreement or a group-affiliated company.

87. The sale of other financial products via the banks has a significant impact on the banks' earnings and on competition in the adjacent markets. Previous analysis has pointed to competition problems in several of these markets. This applies, for example, to mortgages, investment fund certificates and to parts of the payment market.

88. The banks typically only offer products from one supplier, and the customers thus do not get help to find better alternatives with competing suppliers when, for example, they need a mortgage loan. Both bank and customer often place emphasis on establishing whole-customer relationships, where the customer's banking operations are gathered in one place, just as the price of some products often depends on the size of the engagement.

89. At the same time, the analysis shows that customers find it difficult to compare banks and products themselves and to see the consequences of their choices. About 40 percent of those who consider switching banks do not do so because of the complexity.

90. On average, approximately five percent of private customers change their primary bank annually. The level has been stable for the past ten years. Customer mobility is relatively low compared to other markets, while conversely mobility appears to be relatively high in an international perspective. The measured customer mobility covers the fact that there is a large group of inactive customers on the market. For example, 60 percent of customers have not changed their primary bank in the past 14 years.

91. In general, customers are satisfied with their own choice of bank. Over half would recommend others to use it, while only eight percent would advise against it. At the same time, the majority of customers – just under 70 percent – are satisfied or very satisfied with their bank advisor.