



Press conference

6 November 2025



Health

The *Autorité* fines Doctolib
€4.6 million for abusing its
dominant position

DECISION 25-D-06

A person with dark skin, wearing a green shirt, is seen from the back, sitting on a light-colored sofa. They are holding a silver laptop. On the laptop screen, a male doctor with a beard and a white lab coat is visible, sitting at a desk in a clinical setting. The background of the slide features a blurred office environment with a desk, a plant, and a chair.

Outline

1. Context

- Markets for online medical appointment booking services and remote medical consultation technology solutions
- Doctolib's dominant position on both markets

2. Anticompetitive practices

- Exclusivity clauses
- Tied selling
- Predatory acquisition of MonDocteur

3. Fines



PART 1

Context

CONTEXT

Market for online medical appointment booking services

- **Two-sided market, bringing together healthcare professionals and patients, with significant network effects:**
 - Patients are attracted to platforms offering a wide choice of healthcare professionals
 - Healthcare professionals are attracted to platforms used by a large number of patients
 - Healthcare professionals are also attracted to platforms where a large number of their peers are present
- **A distinct market from other appointment booking methods**
(secretary/remote secretary, direct booking by healthcare professionals)
- **Significant expansion during the Covid-19 health crisis:** the management of online appointments during the Covid-19 vaccination campaign was entrusted by the French government to several platforms (Doctolib, Maiia, KelDoc)



CONTEXT

Market for remote medical consultation technology solutions

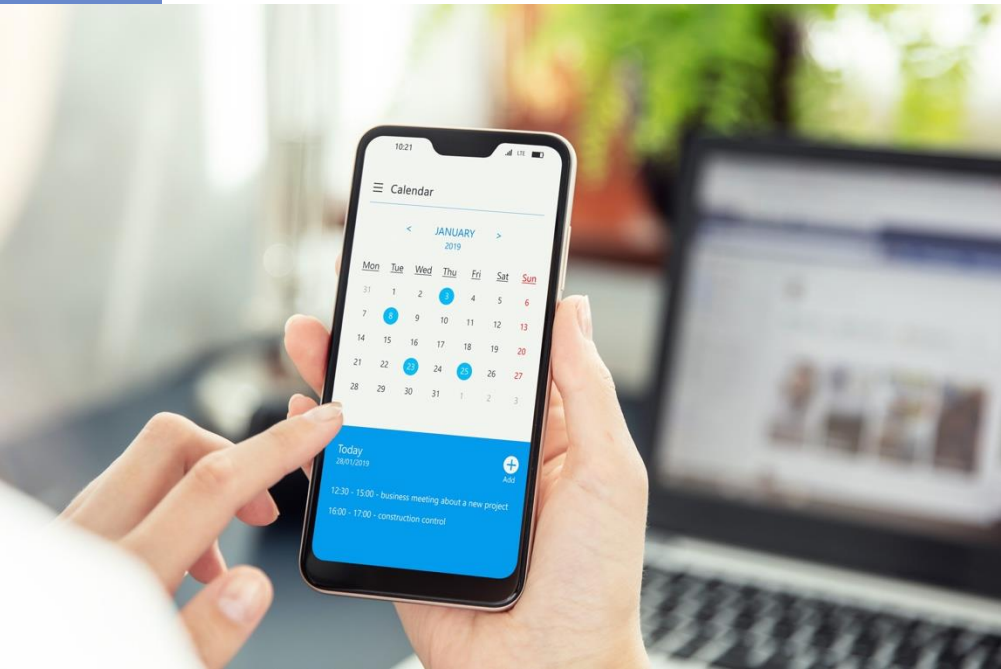
- A distinct market from online medical appointment booking
- A regulated market:
 - Specific requirements under the French Public Health Code (*Code de la santé publique*)
 - A different service than mainstream messaging services
- Sharp rise in the use of remote medical consultation services during the Covid-19 health crisis



CONTEXT

Doctolib's dominant position

On the online medical appointment booking services market



➔ Key dates:

- **2013:** Doctolib founded
- **2017:** dominant position
- **2018:** acquisition of its main competitor (MonDocteur)
- **2022:** market share of more than 70%, or even 90% depending on the criterion (value, number of customers, number of appointments made)

➔ Why is Doctolib in a dominant position?

- Significant market share
- Competitors' much smaller market shares
- Unmatched reputation
- Barriers to market entry
- Customers' weak countervailing purchasing power

CONTEXT

Doctolib's dominant position

On the remote medical consultation technology solutions market



- Leader since the launch of its product in 2019
- Significant market share
- Unmatched reputation
- Barriers to entry
- Customers' weak countervailing purchasing power



PART 2



Anticompetitive practices

ANTICOMPETITIVE PRACTICES

Doctolib combined exclusivity and tied selling practices (1/2)

Exclusivity clauses in subscription contracts

- 2017-2023: inclusion in subscription contracts of exclusivity clauses, under which Doctolib could suspend or terminate the contract in the event of non-compliance

BEFORE MARCH 2021	AFTER MARCH 2021
Restriction on using competing services to those “offered” by Doctolib	Restriction on using competing services to those “subscribed” to with Doctolib
Example: a Doctolib Patient customer cannot subscribe to a competing appointment booking or remote medical consultation service	Example: a Doctolib Patient customer cannot subscribe to a competing appointment booking service but may subscribe to a remote medical consultation service

- Exclusivity clauses retained by Doctolib, despite warnings from its legal department on their anticompetitive nature

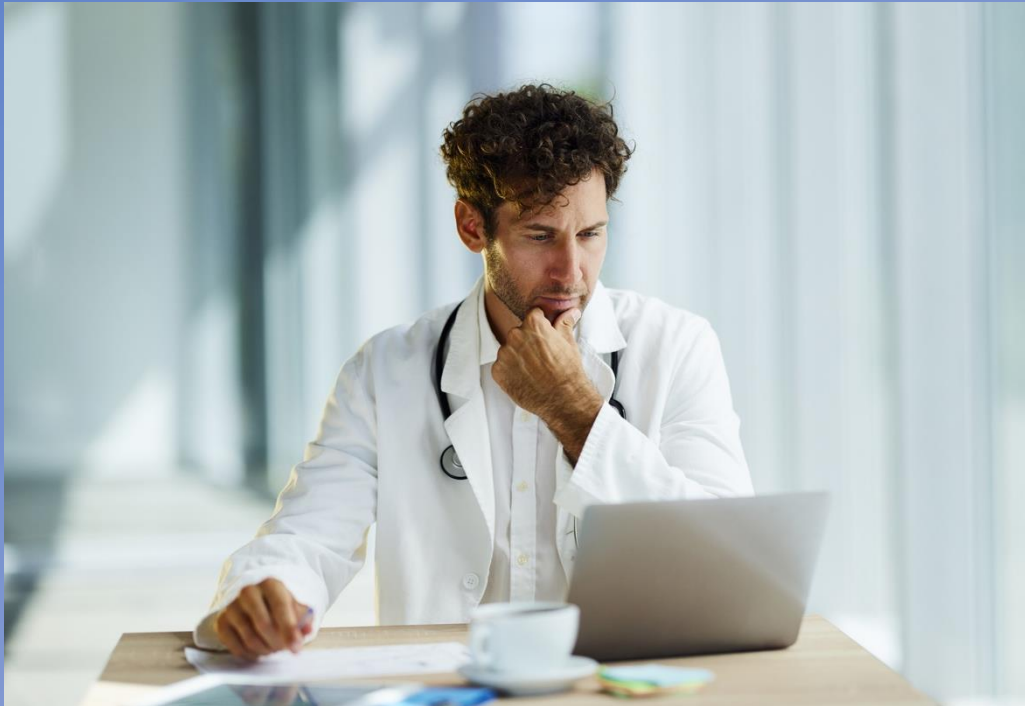
Obligation to subscribe to Doctolib Patient to use Doctolib Téléconsultation

- Prior subscription to Doctolib Patient required to access Doctolib Téléconsultation
- Any healthcare professional wanting to use Doctolib Téléconsultation must therefore subscribe to Doctolib’s online medical appointment booking service and cancel any subscription to a competing service
- Practice actively implemented by Doctolib as part of its commercial strategy

ANTICOMPETITIVE PRACTICES

Doctolib combined exclusivity and tied selling practices (2/2)

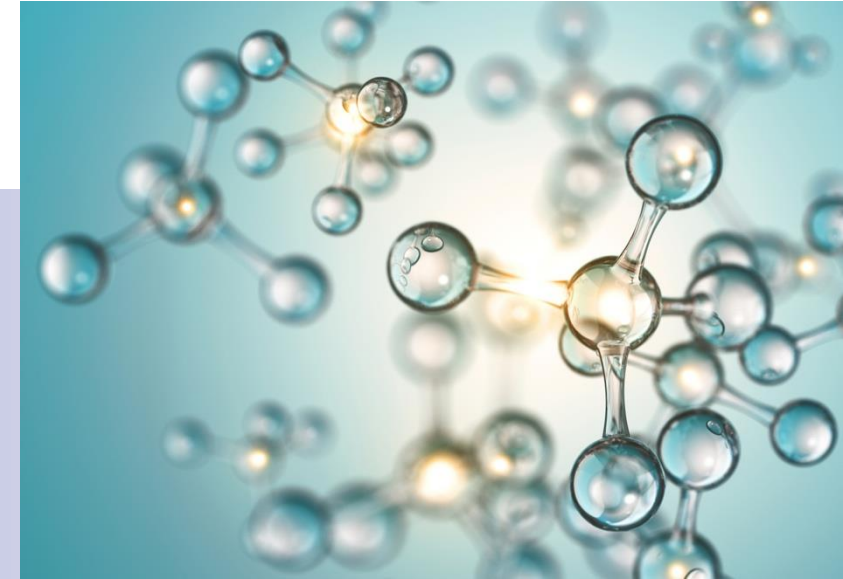
Consequences



- Doctolib required any healthcare professionals that already had a subscription to a competing service to cancel their subscription
- Leveraging its reputation and commercial presence, Doctolib rapidly attracted a large customer base and made its customers captive
- Harmful consequences for competing operators, both small and backed by large groups, certain of which stopped or abandoned the idea of developing a similar service

Predatory acquisition of MonDocteur

- Acquisition in July 2018 of its main competitor, MonDocteur. The acquisition was not examined under merger control, as the transaction was below the notification thresholds
- For the first time, the *Autorité* has fined a below-threshold transaction based on abuse of dominant position
- There was a clear objective within Doctolib to “kill the product”, “the creation of value [...] is not the addition of [MonDocteur] but its disappearance as a competitor”
- According to a document commissioned by Doctolib, following the acquisition of MonDocteur, “Doctolib will operate without any competition in France”
- Doctolib saw the acquisition as a lever for “increasing its prices by 10 to 20%”. Following the transaction, Doctolib increased its prices several times, more than initially planned and without any impact of its growth





PART 3



Fines

FINES

The *Autorité* has imposed a total fine of €4,665,000



Exclusivity and tied selling:

Serious practices, which foreclosed the markets concerned and eliminated the competition

➔ **Fine of €4,615,000**



Acquisition of MonDocteur:

- First time a company in France has been fined for a predatory acquisition (*Towercast* judgment, CJEU 16/03/2023)
- Serious practice
- Legal uncertainty prevailing prior to the *Towercast* judgment taken into account

➔ **Fixed fine of €50,000**



The practices implemented by Doctolib had the effect, at least potentially, and regardless of the company's own merits, which are not disputed, of eliminating competitors from the markets concerned