

16 June 2025

CCCS Raises Concerns Over Problematic Features on Agoda's Website

- 1. The Competition and Consumer Commission of Singapore ("CCCS") has raised concerns with Agoda¹ over several design features of its Singapore website (https://www.agoda.com) and mobile application relating to its accommodation search and booking services. Agoda has since voluntarily provided an undertaking and cooperated with CCCS to make changes to its website and mobile application to ensure that consumers get accurate and adequate information to consider before they make their purchases.
- 2. CCCS's concerns related to how the implementation of certain features may mislead consumers, such as (a) the presentation and ranking of search results, (b) the way certain labels (i.e., badges) were used, and (c) the use of countdown timers. Details of these potentially misleading features and the remedial action taken by Agoda are as follows²:
 - a. "Best Match" search results: Agoda presented certain search results as being the "Best Match", which suggest that such rankings were the most compatible results based *solely* on their search criteria (such as the travel dates or guest ratings). However, Agoda's search results from its algorithm also took into account the money that Agoda would earn.³ Agoda has since replaced the "Best Match" label with "Our Picks" to better reflect that the results are Agoda's recommendations.
 - b. "Agoda Preferred" badge: The badge appeared on selected properties alongside an explainer reading: "Agoda Preferred recommends trusted and verified properties that have a long-standing relationship with Agoda and meet certain criteria". CCCS is concerned that the explainer does not adequately explain the criteria, including the fact that businesses have to pay more to Agoda for the badge.⁴ Agoda has since revised the explainer to clearly disclose that these properties pay additional commission to Agoda.

² Refer to Annex A for the concerns raised by CCCS and changes made by Agoda.

¹ Agoda Company Pte. Ltd.

³ Agoda's Terms of Use states that "Money earned by Agoda" is one of the factors considered in the automated algorithm for default ranking of accommodations.

⁴ Agoda's Terms of Use states that Accommodation Travel Suppliers are able to pay for prime positioning in search results.

- c. **Default "Ranking" of search results**: The manner in which accommodation search results are ranked can potentially lead consumers to believe that the listings were ordered solely based on their search parameters. In fact, as set out in Agoda's Terms of Use, accommodation providers could boost their visibility by paying Agoda as part of a "Preferred Partner program" or by sponsoring their own listings. Agoda has revised the explainer to clarify that the specific placements of these accommodations are influenced by other factors including money paid to Agoda.
- d. "Cheapest x-star stay" label: Accommodations presented with this label were not always the lowest-priced option when the search results are sorted by price for the same star-rating. CCCS is concerned that this label may suggest to consumers that the labelled accommodation is the cheapest option available when it actually may not be. To avoid confusing consumers, Agoda has removed the "cheapest x-stay" label.
- e. **Time limit to complete booking**: Consumers using Agoda's website were shown a 5-minute countdown timer as they were inputting their details to complete their accommodation booking. The time could in fact be extended up to 20 minutes by clicking the "I need more time" button. CCCS is concerned that the initial time limit may not be adequate and might create a false sense of urgency for consumers to quickly complete the booking. Agoda has since standardised the website's countdown timer to align with that of its mobile application from 5 to 20 minutes. This provides more time for consumers to complete the booking process, or shop around for better options.

Businesses Should Exercise Care in their Use of Design Interface

- The use of user interface features by businesses which may mislead or even deceive consumers can be considered unfair trade practices under Singapore's fair trading laws. Businesses engaging in unfair trade practices may face enforcement action by the CCCS.
- 4. Businesses should design their user interface to present options in a clear and neutral manner to consumers so that consumers can make well-informed choices. Important and material information, particularly those relating to pricing, should be presented upfront and not be hidden in fine print. Statements regarding the practices and policies of a business should be clear and easily understood.

Advice for Consumers

5. Chief Executive of CCCS, Mr Alvin Koh said, "This is part of a series of actions we will take to improve the online commerce environment, where consumers

may face undue pressure to complete their transactions, problematic website features or even "dark patterns" such as misleading messages, and manipulative user interfaces. In the coming months, CCCS will make it a point to educate consumers on identifying these misleading practices and how consumers can better protect themselves."

6. Members of the public who would like to report cases of unfair trade practices by errant businesses may contact the CASE at 6277 5100 (Mondays to Fridays, 9am to 5pm) or via https://crdcomplaints.azurewebsites.net/.

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About the Competition and Consumer Commission of Singapore (CCCS)

The Competition and Consumer Commission of Singapore ("CCCS") is a statutory board of the Ministry of Trade and Industry. CCCS administers and enforces the Consumer Protection (Fair Trading) Act 2003 or ("CPFTA") which protects consumers against unfair trade practices in Singapore. CCCS is also the administering agency for the Competition Act 2004 which empowers CCCS to investigate and adjudicate anti-competitive activities, issue directions to stop or prevent anti-competitive activities and impose financial penalties. Our mission is to make markets work well to create opportunities and choices for businesses and consumers in Singapore.

For more information, please visit www.cccs.gov.sg.

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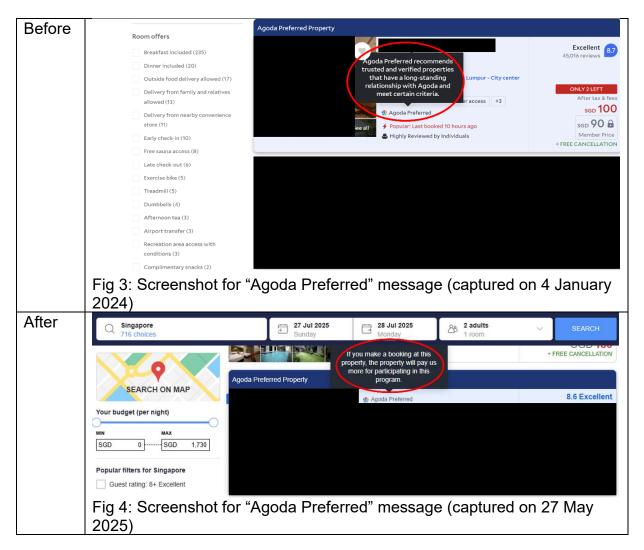
DID: 6325 8206

Annex A: Examples of features on Agoda's website and mobile application that were identified as concerns by CCCS ("Before") and the changes made by Agoda ("After")

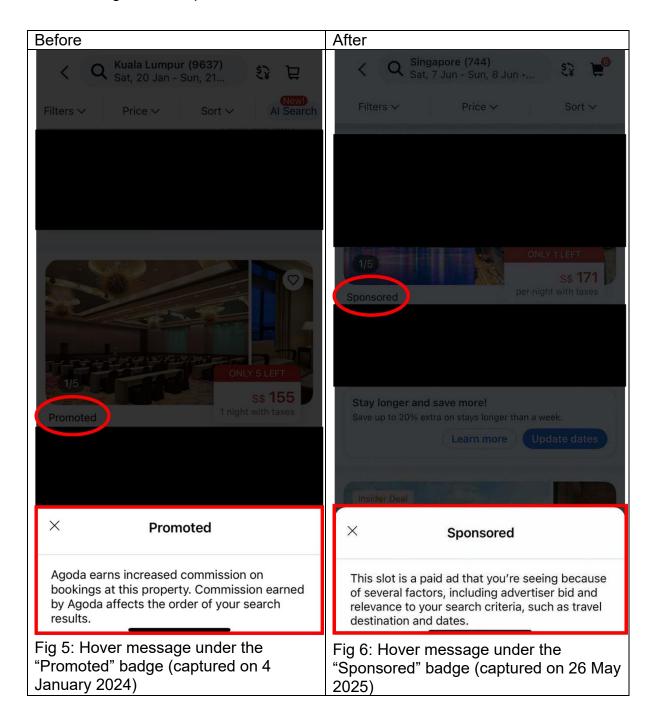
1. Changing "Best Match" to "Our Picks"



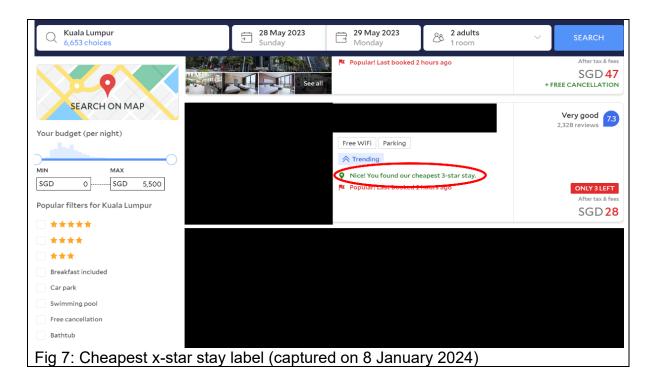
2. Revision to the hover message shown for "Agoda Preferred" properties



3. Amending "Promoted" badge to "Sponsored", along with a revised hover message that it is paid for



4. Removal of "Cheapest x-star stay" to avoid confusion as the property is not necessarily the cheapest in that category



5. Increase in the countdown timer on the Website from 5 to 20 minutes

