

Black Friday 2026: EU compliance checklist

Run through it for each client store that sells in the EU, before the sale goes live. Black Friday is 27 November 2026 and Cyber Monday is 30 November.

Dates that set the reference price

Sale starts 27 November: reference window 28 October to 26 November.

Black Week starts 20 November: reference window 21 October to 19 November.

New sale in December: if it starts within 30 days after the Black Friday price ends, the Black Friday price is the new reference.

1. Crossed-out prices

Omnibus rule, every EU country (Directive 2019/2161, Art. 6a)

- ☐ Each crossed-out price is the **lowest price the store charged in the 30 days before the sale**, per market and per variant. Earlier promotions and public discount codes count.
- ☐ No regular price was raised in October only to be "reduced" in November.
- ☐ Every percentage ("-30%") is worked out from that lowest price, not from the RRP or an older regular price (EU Court of Justice, case C-330/23).
- ☐ Deeper cuts during the sale (for example -20%, then -30% on Cyber Monday): Germany lets the first reference stay if the reduction runs without a break (§ 11(2) PAngV); Poland has no such exception.
- ☐ The store keeps a dated record of its prices per market. Authorities ask for it, and the store has to prove the reference.

2. The 30-day line next to the price

National practice

- ☐ **Poland:** the lowest price of the 30 days before the reduction is shown in words next to the sale price, for example "Najniższa cena z 30 dni przed obniżką". UOKiK rejects "cena omnibus", "było" and "z ostatnich 30 dni".
- ☐ **Netherlands:** the ACM expects a short text next to any reference price that says what it is.
- ☐ **Germany:** courts require the reference to be unmistakably clear (BGH, I ZR 183/24), so a short label next to the price is the safe option.
- ☐ **Elsewhere:** not strictly required when the crossed-out price is right, but a label shows shoppers and authorities which price the discount comes from.

3. Withdrawal button

Art. 11a Consumer Rights Directive, in force in 21 EU countries

- ☐ A clearly labelled withdrawal function in the country's official words: "Vertrag widerrufen" (DE, AT), "recedere dal contratto qui" (IT), "renoncer au contrat ici" (FR, BE), "cancel contract here" (IE).
- ☐ A confirmation step, such as "Widerruf bestätigen" or "conferma recesso".
- ☐ An acknowledgement of receipt by email, with the date and time, sent without undue delay.

Not yet national law in PL, ES, CZ, PT, SI and LU. Returns peak after Black Friday, so this is when it gets used.

4. Legal guarantee notice

Directive 2024/825, from 27 September 2026 in 18 countries

- ☐ The harmonised notice in its official design and wording, in the shopper's language, shown before the order is placed (Implementing Regulation 2025/1960).
- ☐ The durability label (GARAN) where the producer gives a free guarantee of durability on the whole product for more than two years.
- ☐ The same information repeated in the order confirmation.

In force in DE, IT, NL, AT and IE among others; FR, ES and PL follow later.

5. Product safety details

GPSR (Regulation 2023/988, Art. 19), every EU country since 13 December 2024

- ☐ Every product page, new Black Friday bundles included, shows the manufacturer's name, postal address and email or website.
- ☐ The EU responsible person, when the manufacturer is outside the EU.
- ☐ A product identifier, and any warnings in the shopper's language.

How Complimus helps

One Shopify app for all four rules. It saves every variant's price daily in each market and shows the lowest price from the 30 days before the sale, and it adds the withdrawal button, the guarantee notice and the GPSR details. Paid plans from \$14.99 a month, with a 14-day free trial. apps.shopify.com/omnibus-price

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