

AMAZON AUDITED DESCRIPTION OF CONSUMER PROFILING TECHNIQUES

NON-CONFIDENTIAL VERSION

DMA.100121 - Amazon; DMA.100018 - Amazon - online intermediation services – marketplaces; DMA.100016 - Amazon - online advertising services

COMPLIANCE REPORTING

PURSUANT TO ARTICLE 15 OF COUNCIL REGULATION (EU) NO. 2022/1925

5 March 2026

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NON-CONFIDENTIAL SUMMARY OF THE PROFILING REPORT

SECTION 1

General information on the gatekeeper

1. **Please provide the name and registered address of the undertaking submitting the present report.**
 - (1) This audited description of consumer profiling techniques (“**Profiling Report**”) pursuant to Article 15 of Regulation (EU) 2022/1925 (“**Digital Markets Act**” or “**DMA**”)¹ is submitted by Amazon.com, Inc., a company with registered address at 251 Little Falls Drive, Wilmington, DE 19808, USA and its affiliates (“**Amazon**”). Amazon.com, Inc. is a publicly traded company founded in 1994, which is headquartered in Seattle, Washington, United States of America.
 - (2) The European Commission (“**Commission**”) has designated Amazon under Article 3. Amazon Europe Core S.à r.l. (“**AEC**”), a subsidiary of Amazon.com, Inc., with registered address at 38, Avenue John F. Kennedy, L-1855, Luxembourg, is responsible for operating, maintaining, and managing all the EU online interfaces surfacing Sellers’² product or service offerings and Amazon’s own retail offerings. AEC also provides Amazon’s European advertising services. References to “Amazon” in this report refer to activities of Amazon’s European entities, primarily AEC as the entity undertaking profiling techniques.
 - (3) Article 15(1) requires designated companies to submit to the Commission an independently audited description of any techniques they use for profiling consumers on their core platform services (“**CPSs**”). “Profiling” is defined by reference to Article 4(4) of Regulation (EU) 2016/679 (“**GDPR**”).³
 - (4) On 6 September 2023, the Commission designated two Amazon services as CPSs, namely:
 1. The Amazon Store online intermediation service CPS, which encompasses the marketplace and the EU online store experience that make physical and digital goods and services available for purchase by our EU customers. The Amazon Store CPS is available in the EU at 9 current EU Amazon Store domains (amazon.com.be, amazon.fr, amazon.de, amazon.es, amazon.it, amazon.nl, amazon.pl, amazon.se, and amazon.ie) (together, “**Amazon Store**”); and
 2. Amazon’s advertising services (“**Amazon Ads**”).

¹ Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act), OJ L 265, 12.10.2022, pp. 1–66.

² Third-party sellers offering products for sale in the Amazon EU marketplaces (amazon.com.be, amazon.fr, amazon.de, amazon.es, amazon.it, amazon.nl, amazon.pl, amazon.se, and amazon.ie).

³ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), OJ L 119, 4.5.2016, pp. 1–88.

(5) In line with the stated policy objectives of the DMA, this report sets out an independently audited description of profiling techniques Amazon uses in these two CPSs.

2. Please provide the name(s), function(s), and contact details of the person(s) within the gatekeeper’s organisation who is or are responsible for preparing and submitting the independently audited description of applied consumer profiling techniques.

Name / Position [Confidential], Legal Director

Address 26-28 Rue Edward Steichen, L-2540 Luxembourg

Email [Confidential]

(6) The Profiling Report is signed by [Confidential], Legal Director, and head of the DMA compliance function (“**DCF**”) at Amazon. The Profiling Report has been prepared by Amazon with assistance from lawyers who support the businesses related to the Amazon Store and Amazon Ads, as well as business and technical teams.

SECTION 2

Information about the profiling techniques of consumers

- 2.1. For each core platform service listed in the designation decision based on Article 3(4) or Article 3(8) of Regulation (EU) 2022/1925, provide a detailed description of all the consumer profiling techniques applied within the core platform service and across multiple core platform services including, at least, information about:**
- a) the specific purpose(s) pursued by each profiling technique(s);**
 - b) a description of each category of personal data and data derived from user activity (in particular, distinguish data and personal data categories actively provided by consumers from observed data) and sources (e.g., first or third party service) for each of these categories of data and a description of personal data processed for profiling consumers applied to or across the designated core platform services (in particular, distinguish data and personal data originating from each of the gatekeeper's services);**
 - c) a description of each category of personal data and data originating from third parties (in particular, distinguishing data and personal data originating from third parties, such as advertisers, publishers, developers, or others) and/or derived from user activity on third parties' services (in particular, distinguishing data and personal data categories actively provided by consumers from observed data and inferred data originating from third parties);**
 - d) a detailed description of the inferred data about consumers derived from the processing of the data and personal data listed in point (b) and/or (c) as well as an explanation of how such derived or inferred data were created;**
 - e) the retention duration of each category of data and personal data listed in points (b), (c), and (d), or duration of retention of the profile itself;**
 - f) the legal ground relied on by the gatekeeper under Article 6(1) and, where applicable, Article 9(2) of Regulation (EU) 2016/679. The reporting under the present point should distinguish the legal ground relied on under Regulation (EU) 2016/679 for the processing of personal data collected directly by the gatekeeper from the legal ground relied on for the processing of personal data originating from third parties;**
 - g) whether consent is required under Article 5(2) of Regulation (EU) 2022/1925 for the processing of data and personal data listed in points (b), (c) and (d) for each purpose of profiling consumers. The reporting under the present point should distinguish between consent under points (a) to (d) of Article 5(2) of Regulation (EU) 2022/1925. In addition, if consent is not required, the reporting under the present point should provide an explanation;**
 - h) where consumer consent is required for the given purpose and obtained by the gatekeeper under Regulation (EU) 2016/679, Directive 2002/58/EC and/or Regulation (EU) 2022/1925, a description of any steps taken to seek such consent to profiling, including visual representations (click-by-click) on how consumers**

can refuse or withdraw consent, any consequences of such refusal or withdrawal, and how any such consequences are notified to the consumer;

i) where consumer consent is required for the given purpose and obtained by third parties (e.g., as required under Article 5(2)(a) of Regulation (EU) 2022/1925), a description of any steps taken to seek consent to the sharing of personal data with the gatekeeper for the purpose of profiling, including visual representations (click-by-click) on how consumers can refuse or withdraw consent, and how the gatekeeper ensures respect of consumer's consent refusal or withdrawal;

j) whether automated decision-making takes place on the basis of an applied profiling technique, the number and object of such automated decisions, the legal effects and other similarly significant effects that the automated decision-making mechanism is producing or may produce, and a description of the algorithms underpinning the automated decision mechanism;

k) qualitative and quantitative impact or importance of the profiling techniques in question for the services and business operations of the gatekeeper. Under this point, please also include information on the number of end users exposed to each profiling technique per year, and the number of business users using the gatekeeper's services based on profiling per year, within the core platform service and, where relevant, across multiple core platform services;

l) actions taken to effectively enable consumers to be aware that they are undergoing profiling and the relevant use of such profiling;

m) statistics on how many consumers choose to undergo profiling and how many refuse it, if such choice is given;

n) whether and when the profiling technique has been the subject of a data protection impact assessment and the main conclusions thereof;

o) any alternative measures to profiling that have been considered and the reasons for not choosing them.

(7) For information relating to the Amazon Store, see Annex 1.

(8) For information relating to Amazon Ads, see Annex 2.

SECTION 3

General information on the auditors

- 3.1 Please provide the name of the auditor(s) or auditing organisation(s) which independently verified and audited the description submitted to the Commission by the gatekeeper, along with the name(s) and contact details of the overall responsible person(s) for submitting the audit conclusions. In addition, please provide:**

Auditing organisation	[Confidential]
The person overall responsible from the auditing team	[Confidential]
Email	[Confidential]
Address	[Confidential]

- a) the personal names and auditing organisation affiliations of all members of the auditing team;**
- (9) All members of the auditing team are part of [Confidential]:
- b) an overview of the professional qualifications, certifications, and domains of expertise of the audit team as a whole;**
- (10) The professional qualifications, certifications and roles of the independent auditors were provided to the Commission in a confidential annex.
- c) declarations of interests by each auditor(s) or auditing organisation which independently contributed to the preparation of the submitted description or independent audit and audit conclusions thereof, specifying in particular any relationship (including commercial or contractual) to the audited gatekeeper.**
- (11) The independent auditors' declaration of interest was provided to the Commission in a confidential annex.
- 3.2. If applicable, please provide the names of any third parties consulted by the auditor(s) or auditing organisation(s) and their contact points.**
- (12) Not applicable.
- 3.3. If there was, at any time, a change in appointed auditor(s) or auditing organisation, please provide the names and contact information for all previously appointed auditor(s) or auditing organisations.**
- (13) Not applicable.

SECTION 4

Information about the audit procedures

4.1. Please provide a description of the audit procedures independently performed by the auditor(s) or auditing organisation(s), the methodologies used to perform the audit (including, where applicable, a justification for the choice of standards, benchmarks, sample size(s) and sampling method(s)). In particular, please provide references to any internationally recognised standards adhered to by the auditor(s) or auditing organisation(s) with respect to, among any other aspects:

a) the audit team's independence;

(14) The description of the auditor's independence was provided to the Commission in a confidential annex.

b) the methodology or processes applied to carry out the audit; and

(15) The description of the auditor's audit methodology and processes was provided to the Commission in a confidential annex.

c) any quality management standards for the audit.

(16) The description of the auditor's quality management standards was provided to the Commission in a confidential annex.

4.2. Please provide an overview and description of information relied upon as audit evidence, including, as applicable:

a) a description of the type and source of audited information;

(17) The description of the type and source of the audited information was provided to the Commission in a confidential annex.

b) the observed period(s) which is subject to the audit into profiling techniques. (N.B: For the first audited description due six months after designation, the observed period should be the 'point in time' two months prior submission of that first audited description);

(18) As per 6 January 2026.

c) the period(s) when the audit was conducted;

(19) Between 6 January and 6 March 2026.

d) any other relevant information.

(20) The description of all other relevant information about audit procedures was provided to the Commission in a confidential annex.

4.3. Please provide a detailed description of any data sources of potential relevance to information required under Section 2 that were not included in the scope of the audit, in particular:

a) detailed reasons for non-inclusion;

(21) None.

b) details on any steps taken to mitigate the consequences of non-inclusion of such data on the completeness and accuracy of information provided in Section 2 as well as audit conclusions and recommendations.

(22) None.

4.4. Please elaborate on any circumstances that could have prevented the audit organisation from performing with a reasonable level of assurance the audit of one or more of the techniques applied for the profiling of consumers.

(23) None.

SECTION 5

Audit conclusions

- 5.1. Please provide the assessment of the auditor(s) or auditing organisation(s) as to whether, with a reasonable level of assurance, the information provided by the gatekeeper in the description is complete and accurate, in view of the information requirements laid down in Section 2 of this template. In particular, the auditor(s) or auditing organisation(s) should provide:**
- a) an assessment of “positive”, “positive with comments”, or “negative”, as to whether the description provided is based on sufficient and appropriate evidence provided by the gatekeeper; and**
- (24) The auditor has issued a “*Positive (Unmodified)*” opinion.
- b) detailed justifications for the assessment in paragraph (a) and any comments concerning potential misstatements, omissions, misrepresentations, or errors that may have a material effect on the completeness or accuracy of the information required in Section 2.**
- (25) The detailed justification was provided to the Commission in a confidential annex.

SECTION 6

Non-confidential overview

- 6.1. Please provide the text, or a reference to the publication, of a detailed, clear, and comprehensive non-confidential overview of the audited description of each profiling technique of consumers applied to or across core platform services listed in the designation decision. The non-confidential overview should enable third parties to obtain an adequate understanding of those profiling techniques and, consequently, to provide meaningful input on them to the Commission. To this end, the overview should constitute a fair representation of the description, while allowing the gatekeeper, where appropriate, to summarise and omit information from the description, including in order to protect business secrets or information that is otherwise confidential. The gatekeeper is required to make this non-confidential overview publicly available in line with the requirements in Article 15(3) of Regulation (EU) 2022/1925.**
 - 6.2. The public, non-confidential overview referred to in Section 6.1 shall be updated at least annually, in line with – and to reflect - the update of the information provided under Sections 1 and 2.**
- (26) Amazon provides a non-confidential version of its Profiling Report, as well as non-confidential summaries of the audited description of the profiling techniques in the Amazon Store and Amazon Ads, respectively in Annex 1 and Annex 2.

**SECTION 7
DECLARATION**

Amazon.com, Inc., as a designated company, declares that, to the best of its knowledge and belief, the information given in this submission is true, correct, and complete, that all estimates are identified as such and are its best estimates of the underlying facts, and that all the opinions expressed are sincere.

Date: 5 March 2026

DocuSigned by:
[Confidential] _____

Name: [Confidential]

Organization: Amazon

Position: Legal Director

Address: 26-28 Rue Edward
Steichen,

L-2540 Luxembourg

E-mail: [Confidential]