

AMAZON AUDITED DESCRIPTION OF CONSUMER PROFILING TECHNIQUES

NON-CONFIDENTIAL VERSION

ANNEX 2

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

ANNEX 2 - NON-CONFIDENTIAL SUMMARY OF DESCRIPTION OF CONSUMER PROFILING TECHNIQUES – AMAZON ADS

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);

- (1) The Amazon Store online intermediation service core platform service (“CPS”) (“Amazon Store”) contains millions of different products and services that customers can purchase. Like most retailers, Amazon uses advertising to help customers see products and services that may be of interest to them. Amazon uses different techniques that personalize the advertising that customers see relevant products and services. Amazon uses personal information about customers’ interactions with its services to personalize ads. Amazon also creates groups of customers, or “audiences”, based on customers’ shopping and entertainment interests on Amazon. We call this type of advertising “personalized” or “interest-based” advertising (“IBA”).
- (2) Amazon’s profiling for personalized ads is based on data that it collects from customer engagement with its services (e.g., products they have viewed in, added to their basket in, or purchased from services like the Amazon Store and Prime Video). Amazon pseudonymizes customers’ personal information before using it to create audiences. Pseudonymization allows Amazon to select personalized ads that may be relevant to a customer’s interests without knowing who that customer is or connecting their Amazon browsing or shopping history to information that identifies them directly, such as name, email, address, or similar information.
- (3) Amazon uses two profiling techniques to select the categories of products and services in which its customers are likely to be interested in order to display relevant advertising to them: “rules-based” and “model-based”. Descriptions of these profiling techniques, including illustrative examples of how they are applied in practice, are set out below.

A. Rules-based profiling

- (4) To carry out its rules-based profiling, Amazon establishes a set of interest categories and defines a membership rule in each audience. Amazon collects personal data about individuals whose device it can associate with an Amazon account, and individuals whose devices it cannot associate with an Amazon account (details of the different categories of data that Amazon collects about customers and visitors are described below). Where that data meets the defined rule for a particular audience, Amazon assigns that device to the relevant audience.
- (5) When a customer then engages with a page on the Amazon Store containing advertising space and has given their consent (as described below), Amazon may determine which personalized ads to display based, in part, on the output of this profiling.

Example: Profiling to group customers interested in Comedy Content

In order to group customers in the market for comedy streaming content, Amazon defines a rule based on viewing types of Prime Video content. For this particular audience, (for illustrative purposes, the audience name may be "Favourite Streaming Genre, Comedy"), this group is defined as users who have streamed Prime Video titles within the comedy genre over the last 180 days. When a device, for example, streams one of the titles in this genre, it is included in this audience segment. When that device subsequently visits pages in the Amazon Store on which Amazon displays advertising, Amazon may then display personalized ads for products relevant to this audience if that customer has consented as described below.

B. Model-based profiling

- (6) To carry out its model-based profiling, Amazon collects personal data about individuals whose device it can associate with an Amazon account, and individuals whose devices it cannot associate with an Amazon account. Details of the different categories of data that Amazon collects about customers and visitors is described below.
- (7) Amazon's model-based profiling uses this data to determine the types of products and other content that are likely to be relevant or of interest to those customers. When that customer then visits an Amazon Store page that contains advertising space, Amazon may determine which personalized ads to display based, in part, on the output of this profiling.

Example: Profiling to identify customers who are likely to own a luxury vehicle

Amazon uses modelling to identify customers who have not registered themselves as owning a luxury vehicle in the Amazon Store, but whose interactions with the Amazon Store indicate ownership of a luxury vehicle. This is called a "lookalike" audience. To create this model, Amazon may use information such as Amazon Store order / purchase history and browsing history, and account information, and inputs these data points into its model, along with whether or not the customer has registered themselves as owning a luxury vehicle. The model then identifies customers are likely to also own a luxury vehicle and places them in this "lookalike" audience.

- 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);**
- (8) Amazon uses the following categories of data to select personalized ads that may be particularly relevant or appropriate for a particular customer to see, although the inclusion of a data category in this list does not indicate that the use of such data necessarily constitutes profiling. The categories of personal data that Amazon processes for these purposes are:

1. Personal data collected where Amazon’s advertising systems do not have any record of the device having previously logged in to an Amazon account:
 - a. Search results in the Amazon services (e.g., search terms entered);
 - b. Products, services, and content viewed in the Amazon services (e.g., products viewed in the Amazon Store but not purchased);
 - c. Pages viewed in the Amazon services (e.g., content pages viewed on Prime Video or Kindle, where the customer did not watch the film / TV show or read the book);
 - d. Device information (e.g., device IDs, operating system, and identifiers associated with cookies that Amazon has placed on the device visiting the Amazon services); and
 - e. IP address.
 2. Additional data collected where Amazon’s advertising systems do have a record of the device having previously logged into an Amazon account:
 - a. Account information (e.g., name, address, and phone number and the customer’s location based on a postal code in the delivery / billing address);
 - b. Orders placed through the Amazon services (e.g., products that customers have purchased);
 - c. Content downloaded, streamed, viewed or used through the Amazon services (e.g., videos watched on Prime Video, books read on Kindle);
 - d. Other information about interactions with content in the Amazon services, (e.g., duration and number of streams and downloads); and
 - e. Data derived from customers’ interaction with devices (e.g., device configuration settings, data access permissions, and identifiers).
- (9) Account information, listed in 2.a. above, is provided directly by customers. The other categories of data, i.e., those listed in 2.b.-e. above, are observed about customers as they use Amazon’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);**
- (10) Amazon does not conduct any profiling using data from third parties and/or derived from user activity on third parties’ services.

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;

- (11) Amazon uses the data described above to infer customers' interests and select personalized ads that they are more likely to engage with. Amazon pseudonymizes the data that it processes in order to make any such inferences.

Example: Placing customers into audiences and displaying ads to customers in that audience

Amazon might infer a customer's gender from their interactions with the Store. To do this, Amazon assess the level of correlation between customers' interactions, such as purchase and search histories, and interactions by other customers whose gender is known. Customers can then be assigned to an audience (such as 'Males') on the basis of that inference. When a customer in such an audience streams a show on Prime Video, for example, Amazon may select an ad for products or content that advertisers wish to show to Male customers.

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;

- (12) As stated in our Interest-Based Ads Notice,¹ Amazon keeps customers' personal data for as long as it is required in order to fulfil the advertising purposes, such as selecting personalized ads or detecting fraudulent activity.

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;

- (13) Separate from the requirements under Regulation (EU) 2022/1925 ("DMA"), Amazon is required to have a valid legal basis for processing personal data under Regulation (EU) 2016/679 ("GDPR"). Amazon relies on consent under Article 6(1)(a) of the GDPR in the context of Amazon Ads to determine which personalized ads to display based, in part, on the output of profiling.

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;

- (14) Amazon obtains consent under Article 5(2)(b) and/or (c), as applicable, before using personal data from multiple Amazon services in the profiling techniques described in

¹ See https://www.amazon.de/gp/help/customer/display.html?nodeId=201909150&ref_=footer_Inte rest_Based_Ads_Notice..

this report to serve IBA. This may occur, for example, where Amazon wishes to display, in the Amazon Store, IBA on the basis of a customer’s Prime Video watch history (e.g., for a DVD of a show the customer has watched on Prime Video).

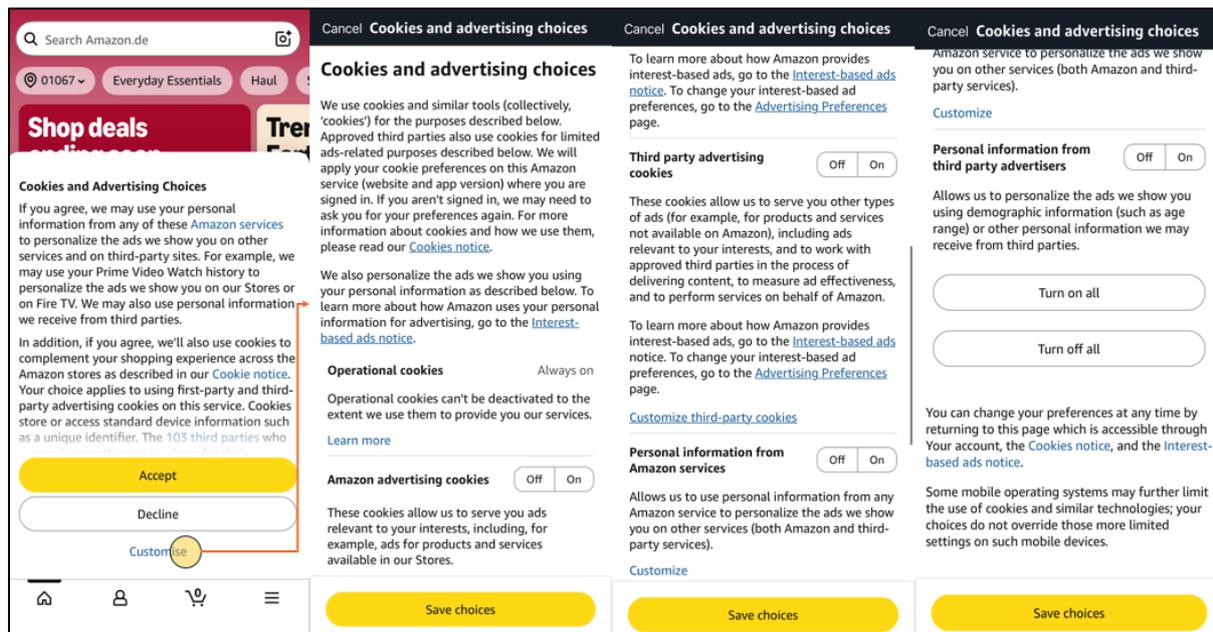
- (15) Amazon’s profiling to assess the types of content customers might be interested in seeing personalized ads for does not involve information it receives from third parties or automatically signing a customer in to other Amazon services. Therefore, consent under Article 5(2)(a) or Article 5(2)(d) is not relevant for this report.

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;

- (16) To obtain customers’ consent, Amazon displays a prompt on the Amazon Store and certain other Amazon services that asks customers to give their consent to Amazon using that customer’s personal data obtained through any of Amazon’s services (e.g., Prime Video), or obtained from third parties, to personalize the ads that Amazon will show the customer on another Amazon service (e.g., the Amazon Store).

- (17) There are two layers to the prompt, as shown in the below example of the experience. If the customer chooses to customize, they will land on a second layer screen, where they can make more granular choices about the use of their personal information from a specific Amazon service (or third parties) to personalize the ads on other services.

Figure 1 - Ads Prompt example



- (18) Amazon also provides customers an accessible page within their account settings where they can review this same information and modify their selections, including withdrawing their consent.

Figure 2 - Cookies and Advertising Page

Operational cookies Always on

Operational cookies can't be deactivated to the extent we use them to provide you our services.

[Learn more](#) ^

We use cookies to provide our services, for example:

- To recognise you when you sign in to use our services.
- To recognise if you are a Prime member and provide other customized features and services.
- To display features, products, and services which might be of interest to you.
- To keep track of items saved in your shopping basket.
- To prevent fraudulent activity.
- To improve security.
- To keep track of your preferences (such as currency and language).

We also use cookies to understand how customers use our services so we can make improvements. For example, we use cookies to conduct research and diagnostics to improve Amazon's content, products, and services, and to measure and understand the performance of our services.

Amazon advertising cookies Off On

These cookies allow us to serve you ads relevant to your interests, including, for example, ads for products and services available in our Stores.

To learn more about how Amazon provides interest-based ads, go to the [Interest-based ads notice](#). To change your interest-based ad preferences, go to the [Advertising Preferences](#) page.

Third party advertising cookies Off On

These cookies allow us to serve you other types of ads (for example, for products and services not available on Amazon), including ads relevant to your interests, and to work with approved third parties in the process of delivering content, to measure ad effectiveness, and to perform services on behalf of Amazon.

To learn more about how Amazon provides interest-based ads, go to the [Interest-based ads notice](#). To change your interest-based ad preferences, go to the [Advertising Preferences](#) page.

[Customize third-party cookies](#)

Personal information from Amazon services Off On

Allows us to use personal information from any Amazon service to personalize the ads we show you on other services (both Amazon and third-party services).

[Customize](#) v

Personal information from third party advertisers Off On

Allows us to personalize the ads we show you using demographic information (such as age range) or other personal information we may receive from third parties.

[Turn on all](#)

[Turn off all](#)

You can change your preferences at any time by returning to this page which is accessible through Your account, the [Cookies notice](#), and the [Interest-based ads notice](#).

Some mobile operating systems may further limit the use of cookies and similar technologies; your choices do not override those more limited settings on such mobile devices.

[Save choices](#)

(19) The above prompt and page state that if customers do not provide their consent, then Amazon will not combine data from the Amazon Store with data from other Amazon services to personalize the ads customers see.

- (20) In accordance with Directive 2002/58/EC,² the prompt described above also requests customers' consent to use cookies and similar tools for the purpose of storing or accessing standard device information to help display IBA. The prompt explains that if a customer refuses consent, no first- or third-party advertising cookies will be used in the Amazon Store.
- 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**
- (21) Amazon's profiling to assess the types of content customers might be interested in seeing personalized ads for does not involve information it receives from third parties.
- 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 that the automated-decision making mechanism is producing or may produce, and a description of the algorithms underpinning the automated decision mechanism;**
- (22) The profiling involved in Amazon Ads does not involve any solely automated decision-making that creates legal or similarly significant effects, as referred to in Article 22 GDPR.
- 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;**
- (23) As described above, like most retailers, Amazon uses advertising—including IBA—to help customers find and discover features, products, and services that might be of interest to them.
- (24) Amazon only infers customers' interests in order to select interest-based ads using the profiling techniques described in this report when customers expressly consent to receiving interest-based ads through the consent prompt described above. In the period from January to December 2025, the consent acceptance rate was approximately [Confidential] for Amazon Ads.
- (25) It is estimated that [Confidential] end users accessed the Amazon Store between January and December 2025. Amazon does not regularly track an aggregate number of business users, which comprises some third-party sellers who advertise using Amazon Ads, as well as advertisers who are not third-party sellers. In the period from January

² Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), (as amended), OJ L 201 31.7.2002, p. 37.

to December 2025, there were approximately [Confidential] third-party sellers on the Amazon Store, some of whom may use Amazon Ads.

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

- (26) Amazon provides clear, transparent, and easily accessible disclosures about how it processes personal data. In particular, it provides information about how it processes personal data to provide recommendations and personalization in its Privacy Notice.³ Amazon’s Privacy Notice, which is accessible at the bottom of nearly every page in the Amazon Store, gives customers meaningful information on the personal data that we collect (see point 2, “*What Personal Information About Customers Does Amazon Europe Collect?*” and point 19.5, “*Data Use Purposes, Data Categories and Legal Bases*”), the purposes for which Amazon processes that data (see point 3, “*For What Purposes Does Amazon Europe Use Your Personal Information?*”), and the third parties with whom Amazon might share the data (see point 5, “*Does Amazon Europe Share Your Personal Information?*” and point 19.3 “*Who are the Recipients of My Information*”). The Privacy Notice also describes Amazon’s use of personal data for advertising and how long Amazon retains customer data.
- (27) Amazon also provides specific disclosures about its uses of personal data, including its profiling, to display advertising in its Interest-Based Ads Notice.⁴ This provides more detailed information about the types of data that Amazon processes, how it processes that data, the recipients of such data, and how to control whether Amazon can use their personal data to profile them to display advertising. The Advertising and Cookies Choices⁵ page allows customers to manage how Amazon and third parties use cookies for personalized ads and how Amazon uses personal information for personalized ads. The Advertising Preferences⁶ page provides customers with a way to withdraw their consent from all advertising based on profiling, along with other choices about the types of personalized ads that Amazon displays on the basis of profiling. The click path to these pages may vary by country.
- (28) Amazon also participates in the IAB Europe Transparency and Consent Framework. Through this framework, operators of third-party websites disclose information about the fact that Amazon is seeking users’ consent for specific purposes, including the use of pre-existing profiles to display IBA to them. This ensures that Amazon customers visiting third-party sites receive information about Amazon’s use of personal data to display such IBA.
- (29) Amazon may apply the above profiling techniques with respect to customers of the Amazon Store or other Amazon services, subject to their ad-related choices.

³ See https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010&ref_=footer_privacy.

⁴ See https://www.amazon.de/gp/help/customer/display.html?nodeId=201909150&ref_=footer_Interest_Based_AdsNotice.

⁵ See <https://www.amazon.de/-/en/privacyprefs/retail?oCT=ads>.

⁶ See <https://www.amazon.de/adprefs>.

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

- (30) Amazon only carries out profiling for the purposes of displaying interest-based ads using the techniques described in this report when customers have expressly consented to receiving interest-based ads on the consent prompt described in **Section h)**, above. In the period from January to December 2025, the consent acceptance rate was approximately [Confidential] for Amazon Ads.

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

- (31) Amazon has conducted a data protection impact assessment (“**DPIA**”; a document that assesses the necessity and proportionality of the processing of personal data, identifies the potential risks of the processing, and sets out the measures Amazon has put in place to mitigate those risks) that addresses the processing of personal data to infer customers’ interests. This DPIA concludes that the overall risks associated with the processing are low.

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

- (32) Amazon has considered, and uses, other techniques to display advertising to customers without the use of profiling. For example, Amazon also displays “contextual ads”, i.e., ads that are linked to the content of the page that they appear on, rather than ads linked to the interests of the visitor of the page.
- (33) However, Amazon’s profiling allows it to display IBA in ways that it would not otherwise be able to. For example, an Amazon customer who has purchased books by a certain author might never actively seek out articles or other information about the author, but would nevertheless welcome knowing when a new book by the author is available for purchase. Similarly, a customer who regularly orders a preferred brand of coffee online might not seek out information about alternatives, but would nonetheless welcome advertisements for sales or offers from other brands. IBA based on data such as shopping and browsing history within the Amazon Store effectively enables Amazon to display relevant personalized ads to customers on behalf of third parties.
- (34) Amazon also considered whether it could conduct its profiling using a narrower dataset. However, it concluded that doing so would mean that it is not able to personalize the advertising it displays as effectively, because it would not be able to display personalized ads for certain types of products and services that they may be interested in. In turn, this would mean that customers might see less relevant advertising, which could increase the risk that they might find the advertising we display inappropriate or annoying.