



# Public Digital Markets Act Compliance Report

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# Introduction

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Nearly three decades ago, Amazon set out to be Earth's most customer-centric company. From the beginning, Amazon has obsessed over earning and keeping customer trust, and continues to invest significant resources and to innovate in order to uphold the trust of our customers and selling partners. Among these innovations, we are continually developing new tools and improvements to create the best shopping experience possible for customers. Amazon started as, and fundamentally remains, a retailer operating online and physical stores around the world. We designed our stores to enable a wide selection, competitive pricing, and convenience for our customers. We provide marketplace services to third-party sellers ("Sellers"), enabling them to offer products for sale, including in Amazon's European Union (EU) stores (each a "Store" and, collectively, the "Stores"). Our Stores show products sold by Sellers and those sold by Amazon's own retail operations ("Amazon Retail") side by side. Amazon Retail sells products that Amazon purchases from suppliers ("Vendors"), as well as Amazon's own branded products.

We know customers have many choices, both online and offline, when they shop. That is why providing a customer-friendly, high-quality, and trustworthy shopping experience is critical to Amazon. We know from many years of experience that customer trust is difficult to earn and easy to lose. Customers come to Amazon for a trusted shopping environment where they can find and buy products. Our goal is to help customers quickly find what they are looking for, so that they have a great experience and return to the Store for future purchases. One way we help customers discover products they might be interested in is through our advertising service ("Amazon Ads"), which supports and complements our core retail operations.

This report is a public, summary version of our inaugural confidential Compliance Report that sets out how Amazon complies with the Digital Markets Act ("DMA"), and explains what these measures mean for our customers and business users. This document also includes a summary of Amazon's profiling techniques in relation to the Store and Amazon Ads.

# Approach to compliance

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Amazon has undertaken significant efforts to audit our systems and design mechanisms to comply with the DMA.

After identifying the relevant and applicable provisions applying to our Store and Amazon Ads operations in the EU, we developed the necessary compliance measures required under those obligations, investing significant resources to do so. Depending on the DMA obligation, this involved building technical solutions, amending existing mechanisms, and reviewing and revising existing policies. In some cases, this meant confirming our existing approach already met or exceeded the requirements of the DMA. We have also established robust internal compliance monitoring and governance reporting processes, including setting up a DMA-specific compliance function.

Finally, prior to the launch of new features and consistent with Amazon's usual processes, we conducted user studies on key DMA requirements. The study outcomes helped inform the final customer-facing touch points, and help our customers, our advertising customers, and Sellers to navigate through the experience and understand its impacts and implications. Looking ahead, we have a wide variety of mechanisms for gathering feedback from our stakeholders, including customers, Sellers, and advertising customers, to help us continuously improve our compliance measures.

Described below are further details on how Amazon has invested in efforts to comply with the DMA.

# Consent

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Amazon works hard every day to earn and maintain customer trust. That's why we have always made it easy for customers to choose personal data options that make the most sense for them.

## Consent prompts

We have introduced two new prompts in our Stores pursuant to Article 5(2) of the DMA that ask customers to: 1) grant consent for personalised experiences in our Stores where those experiences require us to use data from other Amazon services like Prime Video and Audible, or vice versa (the "Store Prompt"); and 2) share consent to use personal data from any Amazon service and third parties to personalise the ads we show across Amazon (the "Ads Prompt"). We have designed this experience to enable customers to navigate easily through the screens and selections, having rolled out the consent prompts from December 2023. Figures 1 and 2 illustrate the Store and Ads Prompts, respectively.

### Consent prompts

To comply with Article 5(2) of the DMA, we have introduced two **new consent prompts**. The **Store Prompt** relates to use of data between the Store and other Amazon services. The **Ads Prompt** relates to the use of their personal data from a specific Amazon service (or third parties) to personalise the ads on other services.

**FIGURE 1**  
**Store Prompt**

**Keep your Amazon services connected**

Amazon provides **multiple services**, such as the Amazon Store, Prime Video, and Audible. A new EU law requires your consent for Amazon services to stay connected and serve you the most relevant experiences based on your interests across these services.

If you accept, we'll continue to improve your experience on the Store using your activity on other Amazon services. In addition, we'll continue to improve your experience on services provided outside the Store with your shopping history. For example, your Prime Video recommendations may consider books you purchased on Amazon. And if you ask Alexa for recipes, we may show you related cookbooks when you visit Amazon.

If you decline, effective 6 Mar 2024, we'll stop using a shared understanding of your interests between Store and other Amazon services. Change your choices at any time at [Data use between services](#).

**Accept**

**Decline**

[Customise and learn more](#)

**Data use between services**

Starting 6 March 2024 EU law requires your consent for use of your personal information between the Store and other Amazon services. If you accept, your current Amazon experience will not be affected. If you decline, your Amazon experience will change by 6 March 2024. You may revisit your choice at any time.

You can choose how we use your personal information between our Stores and the other Amazon services listed below to improve your experience, including by making better recommendations. Select and save your individual choices or click "Accept all":

**Stores and Alexa** ☐ On ☐ Off

Allows Amazon to use your personal information between the Stores and Alexa. [Learn more](#)

**Stores and Amazon device services** ☐ On ☐ Off

Allows Amazon to use your personal information between the Stores and Amazon device services. [Learn more](#)

**Stores and entertainment services** ☐ On ☐ Off

Allows Amazon to use your personal information between the Stores and other Amazon services. [Learn more](#)

**Accept all**

**Decline all**

**FIGURE 2**  
**Ads Prompt**

**Cookies and advertising choices**

If you agree, we may use your personal information from any of these **Amazon services** to personalize the ads we show you on other services. For example, we may use your Prime Video Watch history to personalize the ads we show you on our Stores or on Fire TV. We may also use personal information we receive from third parties (like demographic information). If you decline, your choices will apply by 6 March 2024. [Learn more](#).

In addition, if you agree, we'll also use cookies to complement your shopping experience across the Amazon stores as described in our [Cookie notice](#). Your choice applies to using first-party and third-party advertising cookies on this service. Cookies store or access standard device information such as a unique identifier. The 103 **third parties** who use cookies on this service do so for their purposes of displaying and measuring personalised ads, generating audience insights, and developing and improving products.

In any case, we use cookies and similar tools that are necessary to enable you to make purchases, to enhance your shopping experiences and to provide our services, as detailed in our [Cookie notice](#). We also use these cookies to understand how customers use our services (for example, by

**Accept**

**Decline**

[Customise](#)

**Cookies and advertising choices**

Starting 6 March 2024, EU law requires your consent for use of your personal information originating from our services and third parties to personalize the ads we show you on any of these other services. If you accept, your current experience will not be affected. If you decline, your Amazon experience will change by 6 March 2024. You may revisit your choice at any time. This does not affect how we comply with your cookie choices.

We use cookies and similar tools (collectively, "cookies") for the purposes described below. Approved third parties also use cookies for limited ads-related purposes described below. We will apply your cookie preferences on this Amazon service (website and app version) where you are signed in. If you aren't signed in, we may need to ask you for your preferences again. For more information about cookies and how we use them, please read our [Cookie notice](#).

We also personalize the ads we show you using your personal information as described below. To learn more about how Amazon uses your personal information for advertising, go to the [Interest-based ads notice](#).

**Operational cookies**

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

[Learn more](#)

**Accept all**

**Decline all**

**Advertising cookies** ☐ On ☐ Off

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.

**Personal information from Amazon services** ☐ On ☐ Off

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). Expand to make more detailed choices.

**Personal information from third parties** ☐ On ☐ Off

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.

You can change your preferences at any time by returning to this page which is accessible through

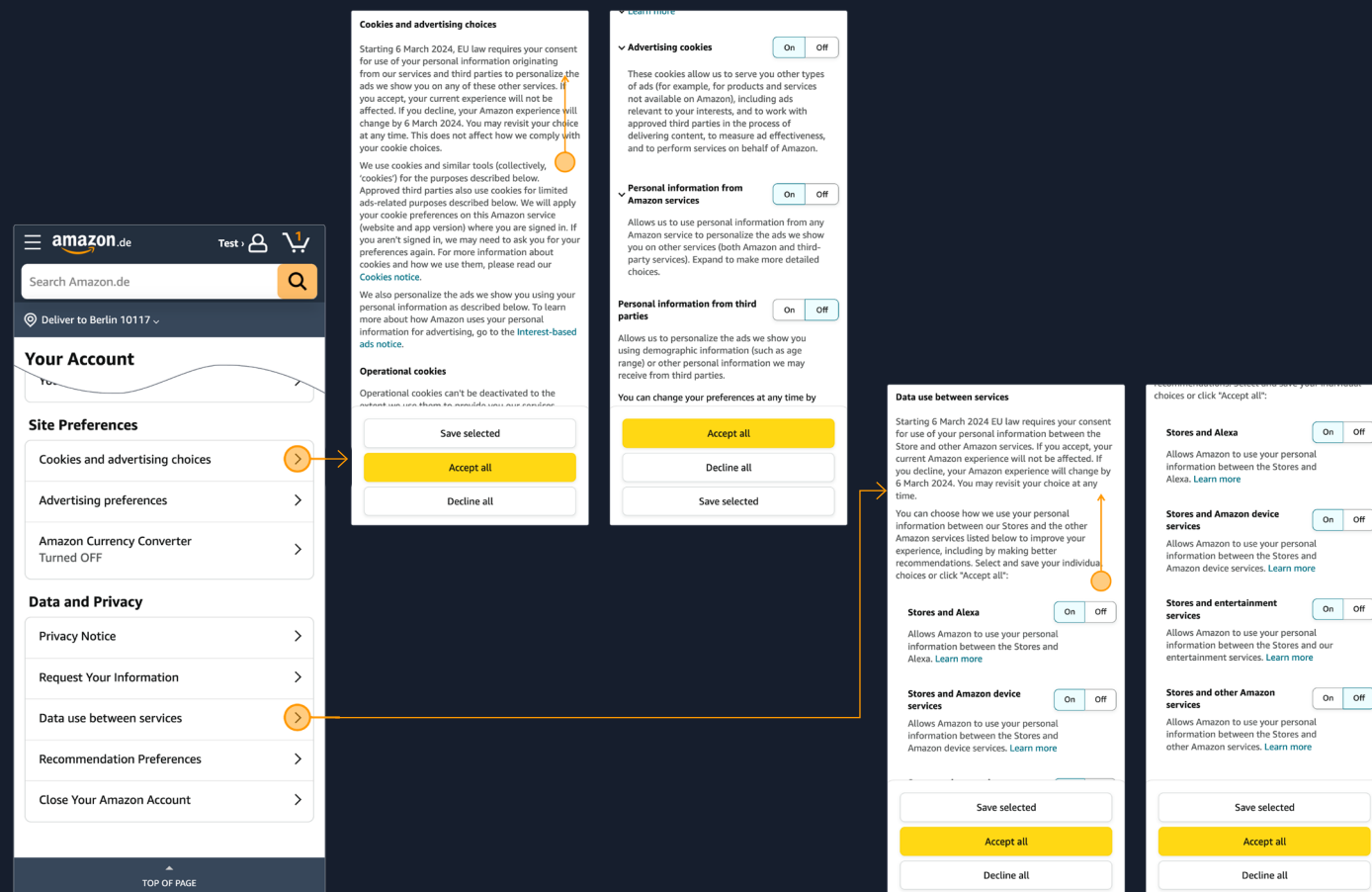
**Accept all**

**Decline all**

## Customer control

As always, customers have complete control of their personal data and can easily update their consent or change their consent selections at any time by navigating to their Data & Privacy section of their Amazon account settings. There, they will have the opportunity to revisit their previous choices, as illustrated in Figure 3 below. When a customer updates their consent selections, their consent record is updated and timestamped with the time of update. The updated consent is then propagated across relevant Amazon systems.

**FIGURE 3**  
Revisiting the Store and Ads choices





## Respecting a customer's consent selections

Amazon saves the consent selections made by customers in a central consent store database. For relevant features offered by Stores and Amazon Ads services that rely on data being combined or cross-used between Amazon services, we will check for consent so that data is only used in the way that customer has consented. For example, if a customer had consented to data sharing between the Store and Prime Video, we can improve that customer's experience in the Store by showing personalised recommendations in the Store based on their Prime Video watch history.

## Ongoing compliance

We have implemented robust audit mechanisms designed to verify that these technical controls continue to work effectively so that customer consent selections are consistently respected.





# Data portability

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To meet the data portability obligation under Article 6(9) of the DMA, we have built a number of technical portability solutions for our EU customers to enable them to easily download, control, and port their data to other services and third parties.

We provide data portability in two ways: (i) by sharing data with an authorised third party through an Application Programming Interface (“API”); and (ii) through a self-service download portal accessible by our customers (“Transfer Your Data” portal).

The Portability API allows authorised third-party developers to access data that our EU customers have given us or generated through their use of the Store or Amazon Ads. It builds upon the success of existing Amazon APIs including important lessons we have learned with respect to the data security risks inherent with APIs. Alternatively, the Transfer Your Data portal allows customers to download the same data, which they can share with third parties of their choice. A customer can also continue to request broader sets of their personal data from Amazon at any time by making a portability request under the General Data Protection Regulation (GDPR).

## Data portability solutions

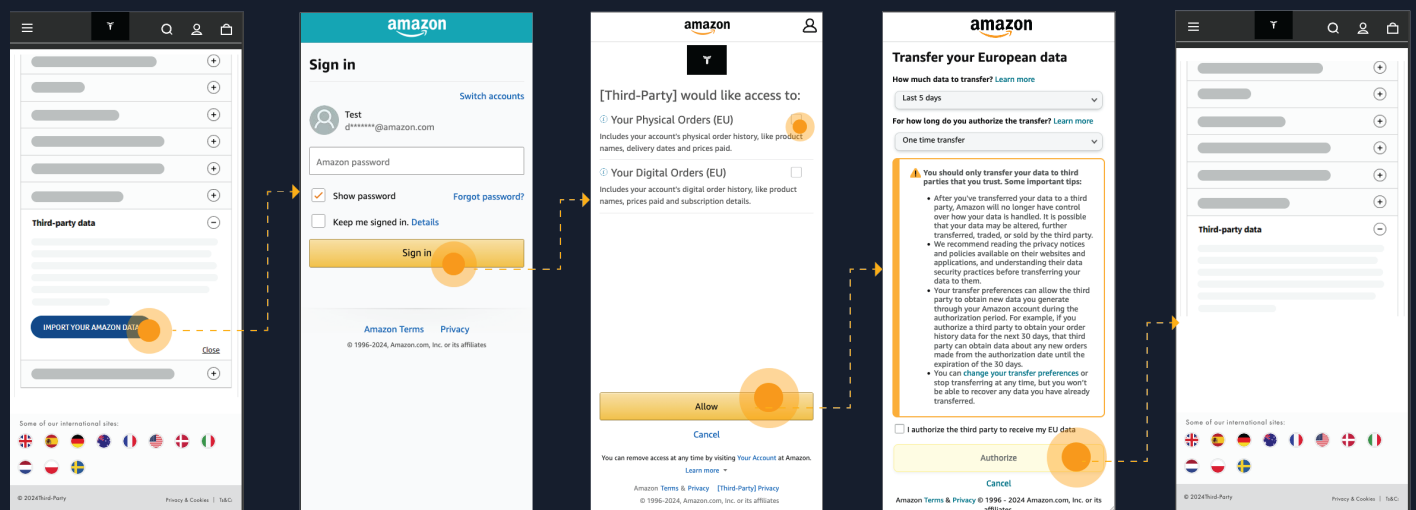
To comply with Article 6(9) of the DMA, we enable third parties who are authorised to receive customers’ information to integrate with our **new Portability API** to access the authorised data. Customers are also able to **download and directly share** datasets with third parties.

## Amazon's customer portability experience

Our technical solutions are customer- and developer-friendly and give customers control over their information. We provide structured, usable datasets, presented in commonly used machine-readable formats (i.e., in JSON format). Customers have options regarding the data categories, amount of data to share, and sharing duration.

Our customers are able to select the specific data categories they wish to share with the third party. We provide customisable choices with respect to the amount of historical data they wish to share, and alert them to the potential risks and consequences of sharing their personal data with third parties. Finally, customers are invited to tick a box explicitly authorising a third party to receive the personal data selected by the customer before clicking "Authorize." At this point, the authorised third party can call the Portability API and receive data according to the customer's preferences. This process is illustrated in Figure 4 below.

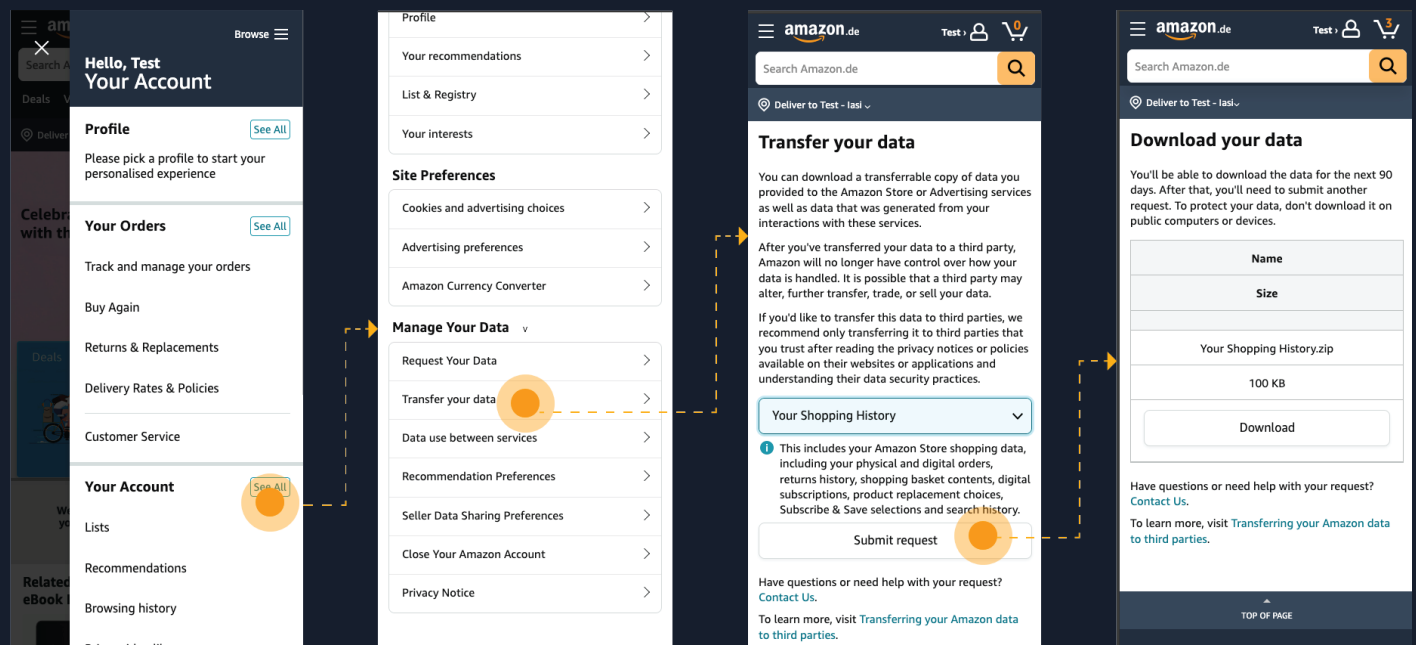
**FIGURE 4**  
Direct end-user portability experience



Alternatively, customers are able to download a copy of the data to share with any third party, as illustrated in Figure 5 below. From their Amazon account page, customers can access the Transfer Your Data portal. They are able to download all of the data categories that we make available through the Portability API. Once customers submit a request in the portal, they will be sent a security email to confirm that they made the request. Upon confirmation, we will process their request and send a notification to the customer inviting them to download the data, once the files are ready to be downloaded. The customer can then download the machine-readable files, accompanied by metadata files. Our customers can make further requests at any time.

**FIGURE 5**

## Customer portability experience via the Transfer Your Data portal



## Amazon's authorised third-party experience

Our technical solutions have also been built with third parties in mind. Our API enables third parties to access and securely ingest the data outlined above continuously. With the customer's authorisation, third parties are able to request the customer's data at any time and get the data transferred within the shortest possible time.

Authorised third parties can easily integrate with and access data from the Portability API. In addition, each dataset is accompanied by metadata files. To integrate with our Portability API, third parties must complete identity, privacy, and data security verifications to help mitigate risks posed to our customers' personal data and address our privacy and data security obligations arising from the DMA and other regulations. The type of verification varies depending on the type of customer data the third party wishes to access. At any time prior to or during the verification process, the third party can register for "Login with Amazon," Amazon's registration and login product, and can access the developer documentation and code samples along with guidelines for integrating with the Portability API, available [here](#). The third party is able to use the Portability API as soon as the verification process is complete.

Once integrated with the Portability API, the third party can embed a button on their customer-accessible application or website that, when clicked on, will direct customers to an Amazon login page where the customer can log into their Amazon account and authorise the third party to receive the data directly. The data that is accessible by the third party corresponds to (i) the data categories the third party has indicated during the registration process it wishes to access for all Amazon customers, and (ii) the specific categories of data that customer has authorised the third party to access.

# Access to business user data

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We offer a comprehensive range of reporting tools and data access solutions to help Sellers manage and monitor their business operations with Amazon, going beyond the requirements of Article 6(10) of the DMA. This includes the significant amount of data and reporting available to Sellers who offer products for sale in our Store.

## Business user data available to Sellers

Sellers and their authorised third parties have access to a number of reports through Amazon's Seller Central. Seller Central is the web-based portal provided to Sellers to manage their business selling on Amazon. The Selling Partner Application Programming Interface (SP-API) is an Amazon API that allows Sellers and third parties to integrate their applications or tools in order to receive programmatic access to data and functionalities such as inventory management, order handling, pricing, payments, and reporting.

### Business user data accessible through Seller Central and the SP-API

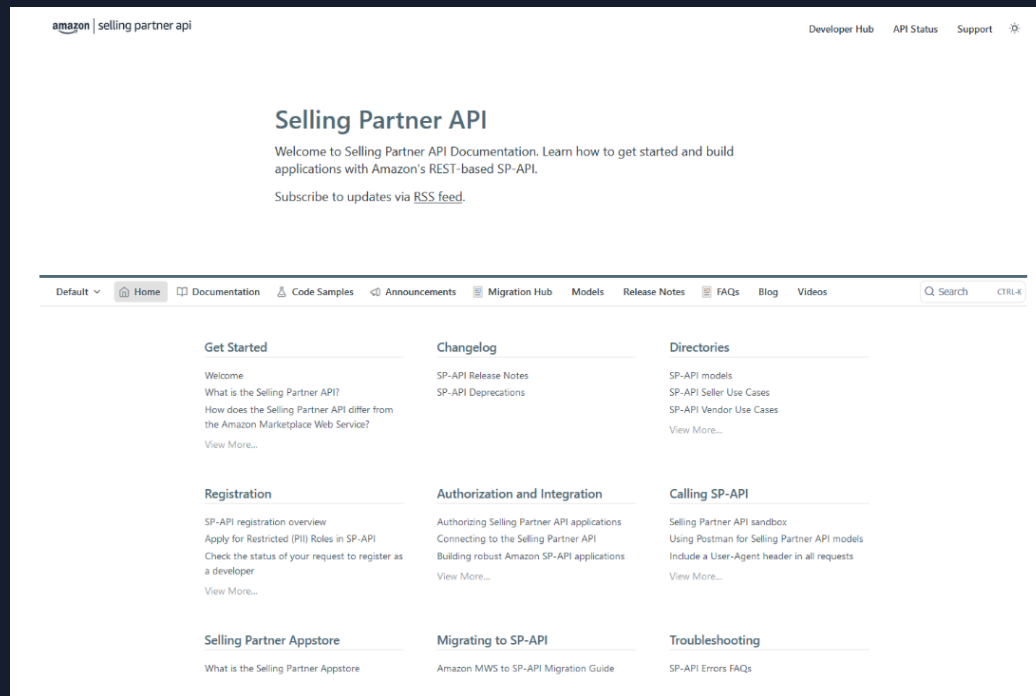
To comply with Article 6(10) of the DMA, we are providing additional **datasets** to our business users alongside the extensive data we already share with our Sellers. The data is accessible through **Seller Central** and the **SP-API**. The new **"End User Data Access" API** provides access to **the personal data** of customers who have consented to share it with those business users.

To access the SP-API, a Seller needs to [register as a developer](#). Alternatively, they can seek out an approved third-party developer for the specific service they wish to avail of, and can authorise that third-party developer via “Login with Amazon.” Once the authentication has taken place, the developer can use the SP-API on behalf of the Seller and provide results within the developer’s interface.

Sellers need to register as a developer only once, in any region and marketplace of choice, to have continuous access to the SP-API and its reports.

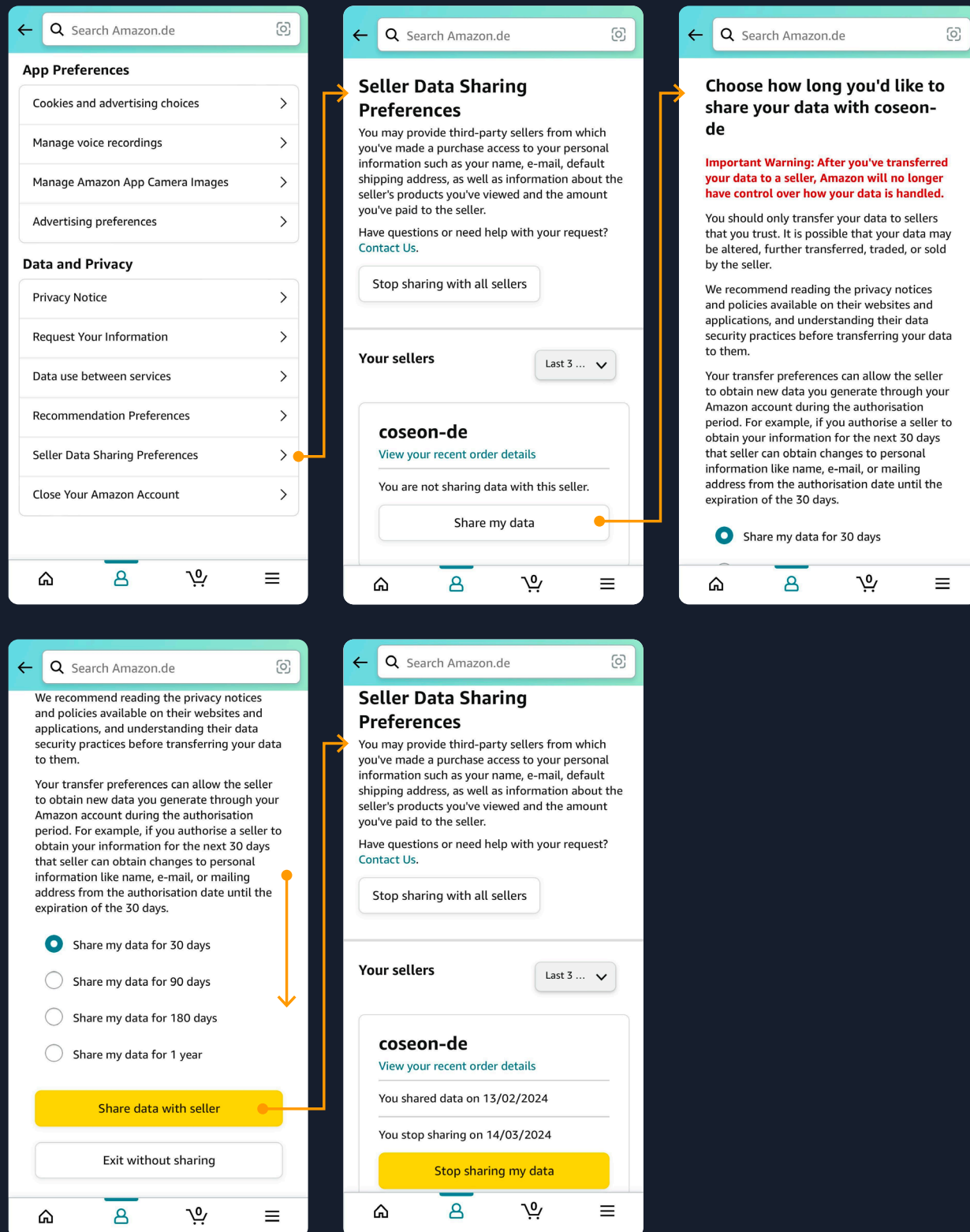
**FIGURE 6**

## Home screen of SP-API library



In addition, Amazon enables customers to consent to Amazon sharing some of their personal data with Sellers from which that customer has made a purchase via our Store. The customer-facing Seller Data Sharing Preferences page (situated with other Data & Privacy pages) enables customers to view the Sellers from which they have made a purchase and then opt in to share their personal data with that Seller, including the length of time they wish to make the data available to that Seller (30 days, 90 days, 180 days, or one year). Customers can visit this page at any time to adjust their data sharing preferences.

**FIGURE 7**  
Business user data customer experience





We provide Sellers with certain data of customers who have previously purchased from that Seller in the Store and have consented to share their personal data with that Seller. Amazon has built a new API called "End User Data Access" which contains consented customer personal data such as name, email, and address, along with data on how many times shoppers looked at a product detail page and gross merchandise sales data relating to the requesting Seller. Once a report is requested and generated, the Seller can download the data using a secure URL.



# Favouring

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An important part of why we are able to give customers a great shopping experience is because our Store is a single store with product selection from both Amazon Retail and Sellers. Having many sellers in one place means customers have a greater choice of products, get better value because there is a wide choice of offers, and can easily compare offers and prices for the same product.

Amazon's business is based on our Store as a whole succeeding. This means it's important that both Sellers and Amazon Retail are successful. The customer's ability to choose amongst multiple brands and products whether from Amazon Retail, or from a Seller, contributes to that success. This model is good for customers, Sellers, and Amazon—it's a win-win-win situation.

Ranking processes following a search query are applied in the product search results page and in the Featured Offer, Second Offer, and All Offer Display Link on the product detail page. These processes operate in an unbiased manner, using objective inputs and weighing them neutrally to facilitate the best possible customer choice irrespective of whether a product is offered by Amazon Retail or Sellers, and therefore are in compliance with Article 6(5) of the DMA.

## Ranked product search results

The Store designs its shopping and discovery experience to feature the items customers want to purchase. That is the Store's primary goal when ranking results in response to a search query on the product search results page. Our ranking models do not differentiate on the basis of whether the product is sold by Amazon Retail or a Seller or whether it is an Amazon product or a third-party product. The Store has no incentive to do otherwise—maintaining trust is at the heart of what we do at Amazon, and we would not risk our reputation with customers by making it difficult for them to find the products they look to buy, nor our trust with Sellers who help maintain the wide selection in our Store for the benefit of our customers.

## Sponsored placements

Amazon Ads enhances the shopping experience for customers by supporting and aiding discovery. Sponsored Products and Sponsored Brands, which are available to Sellers and Vendors, appear on the product search results page and other parts of the Store, and are optimised to be highly responsive to customers' search intent based on keyword and other factors. Sponsored Products and Sponsored Brands are sold using a real-time bidding process, in which third-party advertisers place bids for ad inventory. These advertising auctions are exclusively for third-party advertisers, and Amazon's branded products do not participate. None of the criteria considers whether the third-party advertiser is a Seller or a Vendor (or whether a Seller uses Fulfilled by Amazon, a program that lets Sellers outsource order fulfilment to Amazon).



## Merchandising Amazon branded products

Rather than bidding through the advertising auction, Amazon's internal merchandisers have a mechanism to facilitate the display of Amazon branded products on the product search results page. Amazon is focused on showing customers the offers they will find most helpful based on where they are in their shopping journey—this lack of bias also informs the mechanism used to display Amazon branded products. All such placements are clearly labelled “Featured from Amazon brands,” to communicate to shoppers that the product being displayed is associated with Amazon. These placements also show an '(i)' symbol with hover over text that explains: “You are seeing this product from an Amazon brand based on the product's relevance to your search query.”

## Widgets in the product search results page

The product results search page may include multi-product placements (“widgets”) designed to help customers discover the products they may be interested in.

None of the criteria for widget ranking considers whether widgets include products offered by Amazon or a Seller.

## Featured Offer and All Offer Display

The same product is often offered by multiple merchants in the Store (often including both Amazon Retail and one or more Sellers). Each merchant independently determines the terms of its offer for the product, including price, shipping options, and item condition (e.g., new or used). Every offer for a given product can be accessed through the product's detail page.

In the product detail page, the offers we display through the "Featured Offer" (the offer of one particular merchant) and the "All Offer" display (showing all available offers for a product) are based on objectively verifiable and non-discriminatory criteria.

To select the Featured Offer, Amazon determines which offer is the most likely to be chosen by the customer should the customer compare all offers. This process is based on criteria and metrics that are applied in an equivalent manner to all merchants in the Store, irrespective of the merchant identity (Amazon Retail or Seller), selling plan (individual or professional), and fulfilment channel (the Amazon Fulfillment Network<sup>1</sup> or Merchant Fulfillment Network<sup>2</sup>).

Similarly, when clicking on the All Offer display link, the customer sees a list of all available offers for the product, with the Featured Offer (if one is selected) shown in first position, and all the other available offers shown from the lowest to the highest priced (item price + shipping fees).

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- 1 This is Amazon's own logistics network, where Amazon is responsible for the transportation of goods from the manufacturer/warehouse to the consumer. It serves Amazon Retail and Sellers who use Fulfilled by Amazon services.
  - 2 Sellers who do not use Fulfilled by Amazon services to fulfil their sales are referred to as Sellers using the Merchant Fulfillment Network.

# Transparency

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We know our advertising customers care about the efficiency and effectiveness of their advertising with Amazon. That's why we offer a range of measurement solutions that help our advertising customers (including brands, publishers, and authorised third parties) understand the reach, impact, and performance of their advertising campaigns.

Set out below are the various ad pricing and performance transparency solutions we have introduced in accordance with Articles 5(9), 5(10), and 6(8) of the DMA.

## Access to pricing and performance data for our advertising customers

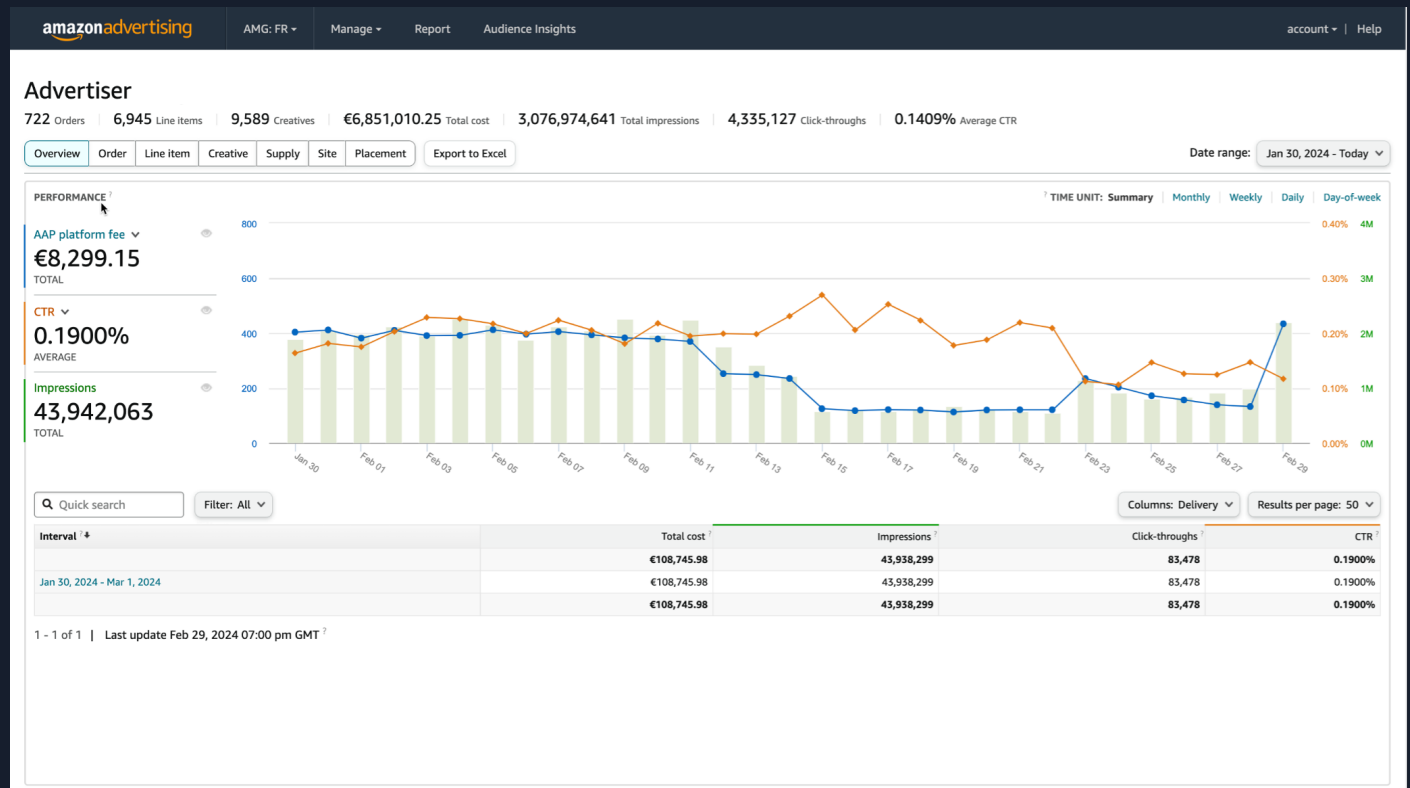
To comply with Articles 5(9), 5(10), and 6(8) of the DMA, we have:

1. Added more **granularity to our pricing reports** to show data on the fees paid by the advertiser and received by the publisher for ads shown on third-party websites and apps.
2. Updated how our advertising customers can measure performance with the introduction of a **new clean room** where advertisers can independently verify the success and impact of their campaigns.

## Pricing transparency tools

Advertisers that use Amazon Ads products already receive online reports that contain pricing information about the ad campaigns that Amazon Ads delivers. As such, they have real-time access to pricing information, including the gross amount that Amazon pays the publisher for certain campaigns, itemised fees from Amazon Ads, prices paid by the advertiser to Amazon Ads, and number of times consumers have seen or clicked on an ad and promotional discounts. Amazon Ads' invoices also itemise all fees that Amazon Ads charges to advertisers including their total cost (based on impressions or clicks) and all billed fees from Amazon Ads by category, with adjustments and taxes.

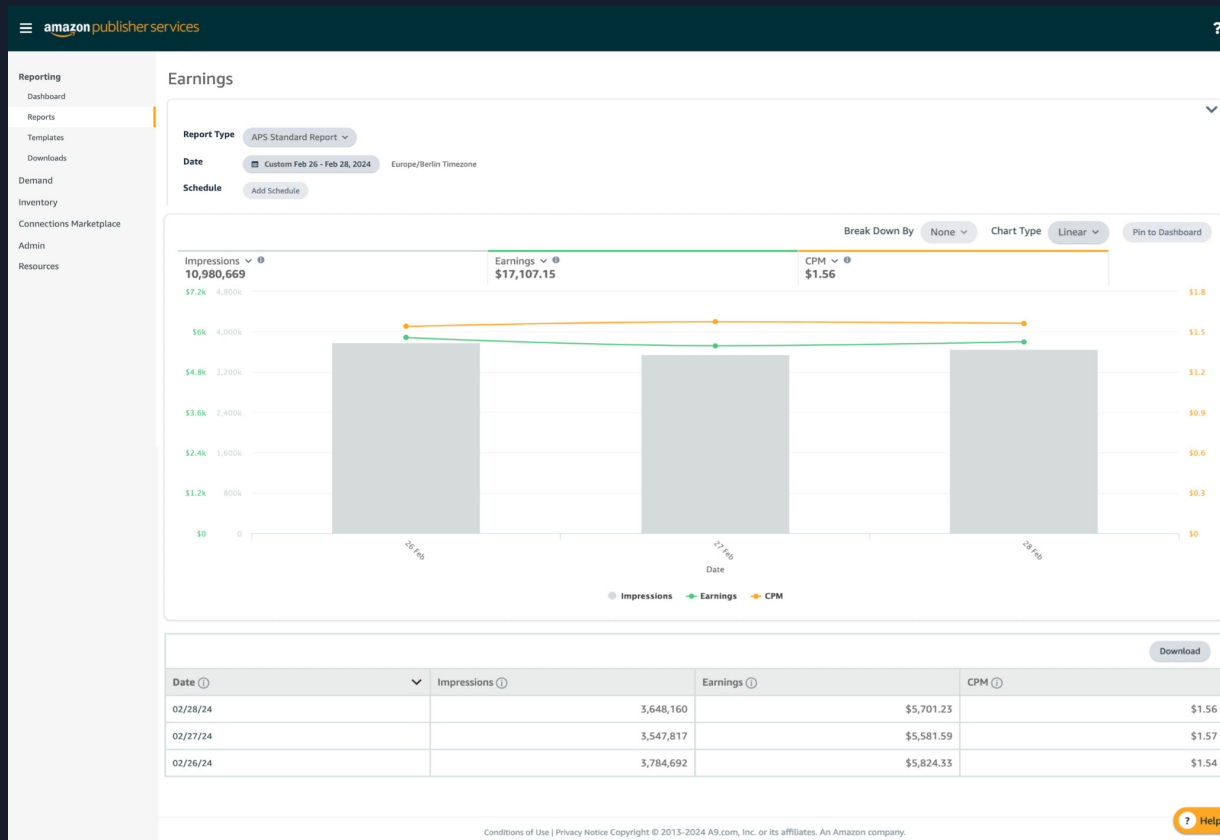
**FIGURE 8**  
Sample of Amazon demand-side platform ("DSP") campaign-level report





Publishers that use Amazon Publisher Services (“APS”) have access to a number of reports that are designed to enable publishers to monitor the performance and earnings for ads shown on their websites and apps. This includes certain bid prices that the advertiser has communicated they will pay for the ad (excluding fees), estimated earnings of the publisher along with bid details, all itemised fee amounts that the publisher pays to Amazon Ads in order for us to sell inventory on their website or app, and the number of times consumers have seen or clicked on an ad. Publishers also receive itemised invoices containing their earnings.

**FIGURE 9**  
Sample of APS earnings report



For the DMA, Amazon Ads has expanded its existing pricing report functionality to show fees with additional granularity. This includes all fees paid to Amazon Ads by the advertiser and publisher, plus any deductions and surcharges. We have made a pricing transparency guide available for advertisers and publishers to help explain fee metrics. We also provide DMA-specific reports for ads shown on third-party websites/apps, which provide data on the price paid by the advertiser/received by the publisher, including any deductions and surcharges. These reports can be downloaded via Amazon's advertiser and publisher portals, and are also accessible to third parties authorised by the advertiser or publisher.

**FIGURE 10**  
Sample of an Advertiser Pricing Transparency report

Date	Publisher name	Currency	Publisher earnings	Supply-side fees	Demand-side fees	Total advertiser cost	Impressions	Click-throughs	Viewable impressions
2/26/24	Undisclosed	EUR	€ 2.96	€ 0.33	€ 23.64	€ 26.93	46,563	183	42,359
2/27/24	Undisclosed	EUR	€ 2.19	€ 0.24	€ 22.73	€ 25.16	45,148	136	41,492
2/28/24	Undisclosed	EUR	€ 1.79	€ 0.20	€ 17.06	€ 19.05	33,812	120	30,514
2/28/24	Undisclosed	EUR	€ 0.00	€ 0.00	€ 0.02	€ 0.02	47	0	46
2/28/24	Undisclosed	EUR	€ 0.00	€ 0.00	€ 0.00	€ 0.00	1	0	0

**FIGURE 11**  
Sample of a Publisher Transparency report

Date	Advertiser name	Impressions	Publisher Earnings	Supply-side Fees	Clicks	Total Advertiser Cost	Demand-Side Fees	Viewable Impressions
2/26/24	Undisclosed	1,536,262	1,506.42	161.90658	712	2,372.05	670.5998	1,070,186
2/27/24	Undisclosed	1,061,947	1,122.15	120.40772	516	1,695.05	421.3079	755,267
2/27/24	Undisclosed	1	0.00062	0.000069	0	0.00129	0.0006	1
2/27/24	Undisclosed	3	0.00859	0.00095	0	0.01285	0.0033	2
2/28/24	Undisclosed	104,028	142.42858	15.19482	47	210.79273	50.74863	70,637
2/28/24	Undisclosed	2	0.0014	0.00016	0	0.00328	0.00172	0

## Performance transparency tools

Likewise, Amazon Ads provides advertisers and publishers with access to aggregated data and extensive online reporting to review ad performance, with each ad type having its own reporting capabilities. This includes, for advertisers purchasing Sponsored Ads, access to campaign reports,<sup>3</sup> targeting reports,<sup>4</sup> and advertised product reports.<sup>5</sup> Advertisers buying via the DSP can also obtain reports through the Amazon Ads console. Advertisers buying Sponsored Ads or other ads via the Amazon DSP can also use our Amazon Attribution and Amazon Marketing Cloud services to measure the effectiveness of their ad campaigns.

**FIGURE 12**

### Sample of a Sponsored Ads campaign report

Currency	Campaign Name	Cost Type	Impressions	Viewable Impressions	Clicks
EUR	TestAdServingCampaign1 – 11/05/2023 10:04:49	CPC	1	0	0
EUR	TestAdServingCampaign2 – 19/05/2023 14:53:31	CPC	1	1	1
EUR	TestAdServingCampaign3 – 19/05/2023 14:53:31	CPC	0	0	0
EUR	TestAdServingCampaign4 – 4/07/2023 17:51:23 008	CPC	0	0	0

Click-Through Rate (CTR)	View-Through Rate (VTR)	Click-Through Rate for Views (vCTR)	Video First Quartile Views	Video Midpoint Views	Video Third Quartile Views	Video Complete Views	Video Unmutes	5 Second Views	5 Second View Rate
0.00%	0.00%		0	0	0	0	0	0	0.00%
100.00%	100.00%	100.00%	0	0	0	0	0	0	0.00%
			0	0	0	0	0	0	
			0	0	0	0	0	0	

Similarly, as regards publishers, Amazon Ads provides daily and hourly aggregate data to publishers and their authorised third parties in the APS Portal including via APIs. Through the APS Portal, publishers have access to bid information and impression data to compare against their own ad server reporting. Publishers also have access to log-level data from their third-party publisher ad servers, which is an additional source of verification against the data provided by Amazon Ads.

<sup>3</sup> This report provides insights across different placement types and identifies campaigns that could benefit from a bid adjustment.

<sup>4</sup> This report gives sales and performance metrics for the keywords advertisers have selected by product and product categories for any ads campaigns that received at least one impression.

<sup>5</sup> This report gives sales and performance insights for advertised products that served at least one impression.

**FIGURE 13**  
APS Ads Inventory data download (customised report)

Browser Family	Country	Device OS	Device Type	Inventory Format	Inventory Type	Request Media Type	Site Name	Slot Name	Buyer	Demand Program	Payment Relationship	Price Point	Request Media Type Forwarded	Response Media Type
Chrome Mobile	US	Android	Phone	Unknown	Web	Display	testsite	story-ad-2	Buyer1	TAM	TAM	3.35	Display	Display
Chrome	US	Mac	PC	Unknown	Web	Display	testsite	story-ad-4	Buyer2	TAM	TAM	1.2	Display	Unknown
Edge	US	Windows	PC	Unknown	Web	Display	testsite	story-ad-8	Buyer3	TAM	TAM	6	Display	Display

Impressions	Earnings	CPM	Bid Requests Forwarded	Bid Responses	Bid Amount	Bid CPM	Bids	Bids Above Floor Price	Bids Lost	Bids Won	Fill Rate	Bid Rate	Revenue Opportunity
5	0.0169	3.374	315	315	0.501489	1.592029	315	315	267	48	1.5873	100	0.1608
0	0	0	437	0	0	0	0	0	0	0	0	0	0
0	0	0	13	13	0.037183	2.860231	13	11	12	1	0	100	0.006

Amazon Ads has also launched a new dedicated clean room where advertisers with EU-based campaigns can independently verify the success and impact of their campaigns in a privacy-safe environment. Advertisers run their own queries within defined parameters and can generate reports based on the data made available in the clean room, which includes ad viewability, ad clicks, ad impressions, and invalid traffic.<sup>6</sup> Advertisers can receive a file (in CSV format) to help them understand the success and impact of their ad campaigns.

<sup>6</sup> This represents ad viewability, clicks, and impressions that were removed by Amazon Ads' traffic quality filter. This includes potentially fraudulent, non-human, and other illegitimate traffic. Advertisers are not billed for invalid traffic.

FIGURE 14  
DMA Clean Room report

Sample Report - Sponsored Ads - Valid Traffic 30 min window						
Advertiser ID	Campaign ID	Valid Clicks	Valid Impressions	Valid Views	Start Date Time	End Date Time
ADTest123	CTest123-XYZ	1451	13411	10123	10/19/2023 17:21	10/19/2023 17:51
Sample Report - Sponsored Ads - Invalid Traffic 60 min window						
Advertiser ID	Campaign ID	Invalid Clicks	Invalid Impressions	Invalid Views	Start Date Time	End Date Time
ADTest204	CTest204-ABC	28	124	35	10/19/2023 17:21	10/20/2023 17:51
Sample Report - Amazon DSP - Valid Clicks for multiple campaigns 30 min window						
Advertiser ID	Campaign ID	Valid Clicks	Start Date Time	End Date Time		
DSPTest123	CTest304-ABD	23	10/19/2023 17:21	10/19/2023 17:51		
DSPTest123	CTest305-ABD	21	10/19/2023 17:21	10/19/2023 17:51		
Sample Report - Amazon DSP - Invalid Impressions for multiple campaigns 1 day window						
Advertiser ID	Campaign ID	Invalid Impressions	Start Date Time	End Date Time		
DSPTest123	DTest304-ABD	12	10/19/2023 17:21	10/20/2023 17:51		
DSPTest123	DTest305-ABD	5	10/19/2023 17:21	10/20/2023 17:51		



# Use of business user data

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Non-public, seller-specific information is the Seller's confidential information, and Amazon only accesses, uses, and discloses such data to support that Seller. Amazon has undertaken a comprehensive review of Amazon's use of non-public Seller data, and implemented various measures and controls designed to prevent this data from being misused. These include (i) compliance measures in relation to automated systems; (ii) compliance measures in relation to employees; and (iii) other measures designed to maintain ongoing compliance.

## Automated systems

Amazon has various automated systems, algorithms, models, and tools that feed into decisions where we may be perceived to be in competition with Sellers. These include systems that support: (i) selection decisions (i.e., identifying selection opportunities, enabling or stopping purchases from Amazon Retail's suppliers (Vendors), or negotiating terms with these Vendors), (ii) inventory decisions (i.e., identifying quantities of products to purchase and manage stock levels), or (iii) pricing decisions. We have reviewed the data inputs to each of these systems to confirm that none of these systems ingests or uses non-public Seller data.

## Employees

Amazon has identified those employees in the relevant organisations who may support decisions where we may be perceived to be in competition with Sellers. In collaboration with the relevant business teams, we have created a dedicated policy and training to educate employees on the prohibition against using non-public business user data for such decisions. We have also designed technical access restrictions for those standard access paths that are used by employees who make manual Amazon Retail decisions in these areas and we have implemented monitoring mechanisms to audit compliance.



## Ongoing compliance

As well as the measures outlined above, Amazon has implemented a range of mechanisms designed to maintain continued compliance with the requirements of Article 6(2) of the DMA, both in relation to automated and manual decision-making. Such mechanisms include review processes to audit proposed system changes, refresher training courses for employees, and updating the controls, monitoring, and auditing mechanisms that apply to relevant data access paths on an ongoing basis.

## Amazon Ads

Amazon's use of non-public data generated through Sellers' use of Amazon Ads is covered by the dedicated policy described above. In addition, Amazon Ads does not use non-public advertiser/publisher data that is generated or provided in the context of their use of Amazon Ads' services to compete with those advertisers and/or publishers.





# Other compliance areas

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## Most favoured nation practices

With regard to application of Article 5(3) of the DMA to the Store, Amazon has reviewed Store-related contracts, program policies, and other measures relevant to Article 5(3) and confirmed that there are no parity clauses that would be incompatible with this provision. We have also implemented guidelines as forward-looking compliance mechanisms designed to prevent any new agreements from containing clauses inconsistent with Article 5(3).

## Anti-Steering and restrictions on complaints

With regard to application of Articles 5(4) and 5(6) of the DMA, respectively, to the Store, Amazon has made changes to relevant program policies and agreements. As a precautionary measure, Amazon has also implemented guidelines as forward-looking compliance mechanisms designed to prevent any new agreements from containing clauses inconsistent with Articles 5(4) and 5(6), respectively.

## Requiring users to subscribe to or register with a “core platform service”

Amazon’s current policies and conditions do not contain any obligation for users to subscribe or register to the Store or Amazon Ads services as a condition to use, access, sign up for, or register to these core platform services. Therefore, no changes are required in order to comply with Article 5(8) of the DMA.

## Termination conditions

Amazon’s current processes meet the compliance requirements of Article 6(13) of the DMA. Amazon’s existing processes enable customers, sellers, advertisers, and publishers to terminate the relevant services without undue difficulty.

# Annex: Profiling

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We use information about customers' use of the Store (e.g., the products they have viewed, added to their basket, or purchased in the Store) to understand what other products they might be interested in seeing, including in advertising that we display on our own behalf and on behalf of third-party advertisers.

Amazon applies two profiling techniques that use this information. The first is "rules-based," where we create rules to determine what content to display when customers visit a page on the Store. For example, if customers have previously viewed or purchased products in the "jewellery" category, we might use this information to display new recommendations or advertising from that "jewellery" category.

The second technique uses a model that helps determine which products and services might be most relevant to customers. For example, a model might recommend running shoes based on a customer's viewing a number of athletic socks and their purchase history in the Store, because other customers with a similar purchase history who also viewed those athletic socks were interested in those running shoes.

Customers can opt out of recommendations that are based on profiling on the Store using personal information about their use of the Store by visiting the Recommendation Preferences on their Amazon account page, and the Your Recommendations page for more granular influence over recommendations they will see in the Store.

On the Advertising and Cookies Choices page, customers can manage how Amazon and third parties use cookies for personalised ads, and how we use personal information from Amazon Services and third-party services for personalised ads. On the Advertising Preferences page, customers can customise their interests to influence the ads we show them, as well as delete personal information from our advertising systems.

