



Damian Collins MP  
Chair, Digital, Culture, Media and Sports Committee  
House of Commons  
London SW1A 0AA

9<sup>th</sup> September, 2019

Dear Mr. Collins,

Thank you for your letter of July 11, 2019 regarding the testimony of Mark Ryland at the meeting of the International Grand Committee (IGC) in Ottawa, Ontario, Canada on May 29, 2019. As highlighted in our testimony, our customers' trust and privacy, and the security of customer data are our highest priority at Amazon. Our customers' trust us to handle their personal data securely and responsibly, and we do not pursue practices that jeopardize that trust.

Our customer-centric approach has led Amazon to follow privacy-by-design principles since our founding. We disclose in our privacy notice the types of data we collect and the limited circumstances in which we share customer data with third parties. Where we believe additional disclosures are appropriate to ensure that we satisfy customer expectations, we provide additional messaging and other signals about data collection. Further, customers in the EU, including the UK, can request and receive their personal data all in one simple download.

In your letter, you asked about data sharing arrangements between Facebook and Amazon. In general, Amazon does not share its users' data with Facebook. As we have stated previously, we only use our customer data in accordance with our privacy notice. We implement appropriate and sophisticated technical and physical controls, including encryption, designed to prevent unauthorized access to, or disclosure of, customer content and to ensure that our use complies with our commitments to our customers.

Amazon customers may elect independently to share information from their Facebook account with services operated by Amazon. For example, a customer may use Alexa to connect to Facebook in order to access photographs held in their Facebook account.

Your letter also refers to the November 2018 event where a limited number of customers' email addresses, or names and email addresses, were disclosed due to a technical error. The issue was promptly fixed, and impacted customers were notified. No additional customer information beyond email addresses and names was involved. With regard to the research done by the firm Checkmarx on Alexa skills, we have put in place mitigations for detecting this type of skill behaviour and we actively reject or suppress such skills. At no time were customers' Alexa devices compromised through the functionality reported by Checkmarx.

You asked us for Amazon's views on whether different competition and antitrust rules should apply to "tech giants". It is our view that different rules are not required. The antitrust laws serve an important purpose that is best achieved when they are applied equally to all firms, consistent with the rule of law. Competition law has developed a flexible framework with well-established tools to understand markets and to protect consumers that have proven adaptable over time, including to the dynamic changes brought about by technology. Moreover technology is not an industry; rather it is a tool now fully

embraced by nearly every industry. That is certainly true of the retail industry that has always been and remains Amazon's principal business. Applying a different analysis to certain firms based on the extent to which they have embraced technology, whether in retail or any other industry, would harm consumers and competition, and lead to legal confusion. Although competition law can and should adapt, our view is that its foundational principle should remain consumer welfare. Other matters, such as privacy, are best dealt with directly through specific legal regimes that can be used better to reach desired policy outcomes. For example, consumer protection and privacy law are better adapted to protecting customer privacy. We believe it is more desirable to have a uniform standard of privacy protection applied to all companies that deal with consumer information rather than making privacy enforcement contingent on an evidentiary showing of market power, which would be required in trying to enforce privacy through competition law. Courts and antitrust enforcers already have the ability to incorporate non-price factors of competition into an antitrust analysis where appropriate.

Finally, regarding the recent announcement on the arrangement to allow Alexa users in the UK to search for information from the National Health Service's (NHS) website, when a customer asks Alexa a question about common illnesses (e.g, Alexa, "what are the symptoms of a cold or chicken pox?"), Alexa will now be able to answer the question from the NHS website. This is the functional equivalent of a user looking for the information online via a website with the ability for customers to ask for the same information via voice.

Amazon is not sharing any of this information with third parties, nor is it selling products or making product recommendations based on this health information, nor is it building a health profile on customers. All information is treated with high confidentiality and Amazon uses multi-factor authentication to restrict access, service encryption, and audits of our control environment to protect it. Moreover, customers are in control of their voice history, and customers in the UK can review and delete voice recordings associated with their account in the Alexa App or by visiting [amazon.co.uk/privacy](https://amazon.co.uk/privacy). They can also opt-in to "delete what I just said" or "delete what I said today".

Thank you for this opportunity to provide additional context to Mark Ryland's responses from the IGC hearing.

Sincerely,

A handwritten signature in black ink, appearing to read "John Park", with a long horizontal line extending to the right.

John Park  
Manager, Public Policy, Amazon